Boatyard & Todd Point Traffic Plan

Final Plan and Final Environmental Impact Report

July 27, 1992

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CITY OF FORT BRAGG
CALIFORNIA

Boatyard/Todd Point Traffic Plan
component of the
City of Fort Bragg General Plan
Circulation Element

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Prepared as the implementation program for the Local Coastal Plan Policies XV-6 and XV-7

1. Introduction

The City of Fort Bragg has created program to fund and develop intersection improvements designed to safely handle existing and projected traffic in the Boatyard and Todd Point area. (See Figure A). This traffic plan was developed as a means of implementing policies of the 1983 Local Coastal Plan (also referred to as the "LCP") by the California Coastal Commission. The Commission called for the development of a specific program by Mendocino County, the California Department of Transportation (CalTrans), and the City to ensure that a system was in place to accommodate both the general traffic in the area and the traffic that will be generated by new development.

Explanation A: Integration of the Specific Plan into the Circulation element

The contents of this chapter replace the original language contained in the 1992 Circulation Element in Chapter IIIA. The goals, policies, and implementing programs contained in this Plan become integrated into the 1992 Circulation Element and the overall Fort Bragg General Plan.

The term *specific plan* is spelled out in the California Government Code §65450 ET SEQ as a means of more precisely implementing a General Plan. The requirements for a specific plan are defined in the law, and are more applicable to the actual development of a planning area. The State General Plan Guidelines permit the preparation of other types of plans intended to provide more detailed policy guidance without needing to meet the regulatory requirements for Specific Plans. The intent of the Local Coastal Plan policies is better satisfied with this document being developed as an *area plan* rather than a specific plan. For this reason, the document will be called a *traffic area plan* or *traffic plan.*

The Boatyard/Todd Point Area Traffic Plan satisfies the Coastal Commission's requirement by adding goals, policies, and implementing programs to the Circulation Element of the Fort Bragg General Plan. The program is funded entirely by the City, even though some of the proposals will have an effect on lands in the unincorporated County. CalTrans will have a major role in its acceptance because the major thrust of the Plan is to improve portions of State Highways 1 and 20.

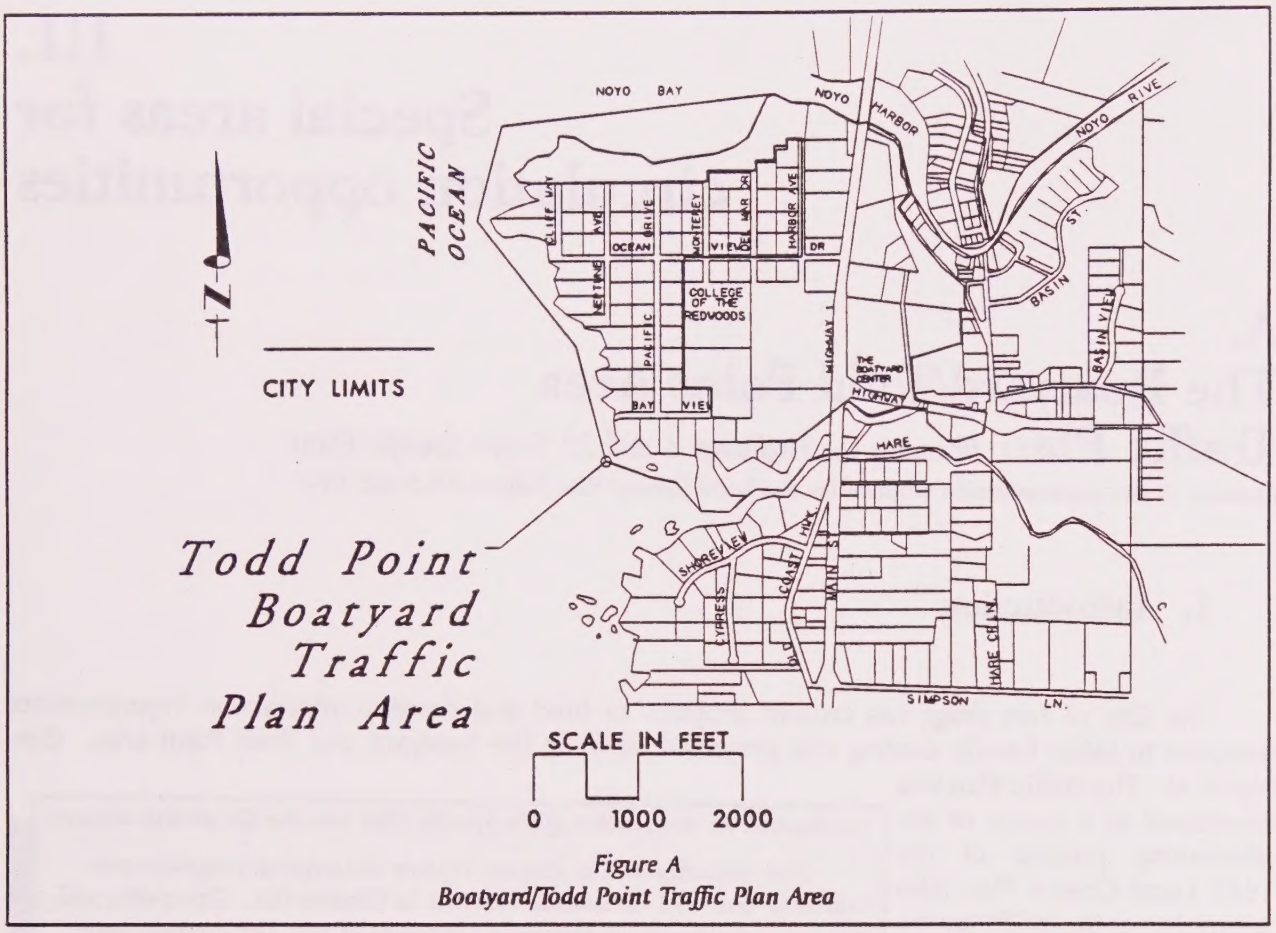

Figure A
Boatyard/Todd Point Traffic Plan Area

There are a number of reasons that this area is the subject of a more detailed examination of traffic than other areas of the City. It is important to maintain as smooth traffic flow as possible between the Hare Creek bridge–Highway 20 area tp the Noyo River bridge and into Fort Bragg and to also accommodate the increase in traffic that will occur as this area develops.

2. The Local Coastal Plan policies

The Local Coastal Plan was adopted in 1983 for the City of Fort Bragg. In Chapter XV, Public Works, the issue of traffic and circulation is discussed. A number of policies have been incorporated into the LCP by the Commission.[1] The policies directed to the Boatyard/Todd Point area are policies XV-6 and XV-7. These two policies state:

[1]Local Coastal Plan Manual (Fort Bragg: City of Fort Bragg, February, 1983), Pages XVB-D through XV-E.

Policy XV-6: Specific Design Plan for Circulation Improvements. The City shall request that the State Department of Transportation and the County of Mendocino join with it in preparing a specific design plan for long-term circulation improvements in the area along Highway 1 between the Noyo River and Hare Creek and out Highway 20 to beyond South Harbor Drive. An intersection improvement district shall be formed by the City Council with the invited participation of the County of Mendocino and all owners of parcels on which development would generate traffic onto Highway 1, between the Noyo and Hare Creek Bridges and to the intersection of South Harbor Drive with Highway 20. The purpose of the district shall be to prepare and assist in implementing a detailed development plan for intersection improvement that will accommodate traffic from developed parcels within the district. The district shall apportion the share of improvement costs above those that will be met by Caltrans and permits for development shall be issued only on receipt of a guarantee that the applicant's share will be paid.

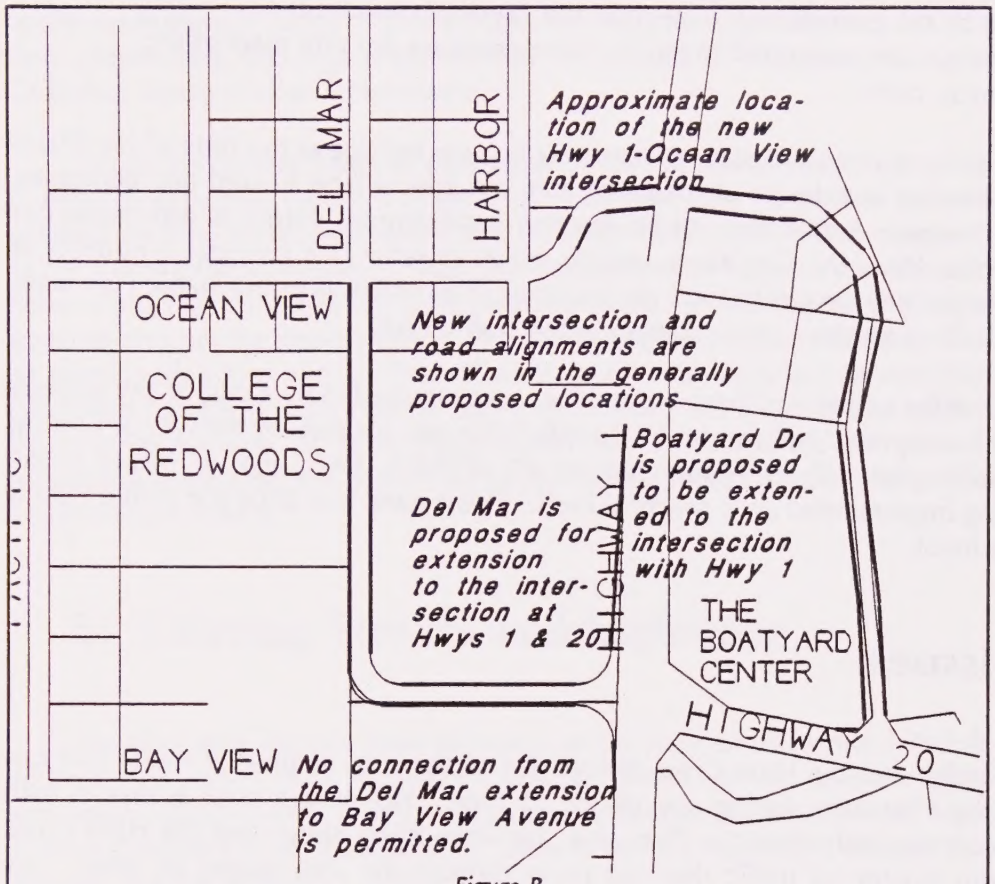

Figure B
Existing and proposed intersections in the Plan area
Proposed routes/intersections are shown as bolder lines

Policy XV-7: Phasing of Development and Circulation Improvements at Highways 1 and 20. Any proposed new development between the Noyo River and Hare Creek which would increase traffic by more than one percent above levels existing at the project inception shall not be constructed until at least one of the following occurs:

1. The design of specific, long-term circulation improvements for the area have been developed and approved by the City of Fort Bragg, the County of

Mendocino (to the extent that the improvements are outside the City Limits), and the State Department of Transportation;

2. A specific proposal for shared funding of the improvements has been approved by the governmental agencies and developer involved; or
3. The developer has committed to pay for his appropriate pro rata share of the improvement costs.

With the status of local, county, and state government finance existing at the time of the Plan's adoption, the final engineering and design of road system in the area will be funded and generated by private development money. Rather than an intersection improvement district as was called out in Local Coastal Plan Policy XV-6, the City has a specific action program that provides a number of options for collecting the funds necessary to fund general road improvements in the Traffic Plan area. Policy XV-6 is carried out through the action program in the Traffic Plan.

Policy XV-7 called out for a choice of three actions that were required to be a part of any projects that were proposed for development before a traffic "specific" plan was adopted by the City or County. The adoption of the traffic plan will satisfy requirement #1 of Policy XV-7, and will result in the Coastal Plan policy being implemented on a practical basis. This means that once the Traffic Plan is adopted, Policy XV-7 is moot.

3. Traffic issues

The Noyo River Bridge and the Hare Creek Bridge dictate the total volume of traffic that can move into or out of the Plan area during any period of time. No matter how extensive road improvements may be constructed within the Plan area, the Noyo River Bridge and the Hare Creek bridge have a maximum amount of traffic that can move through the area during an hour. The presumption in developing the Traffic Plan is that the Noyo River Bridge would reach its maximum capacity during the peak hour of the day. The maximum bridge capacity, which is explained on page 12, was used as the constant to provide for the designs of the new and improved intersections.

A further constraint is to design the intersections and allocate traffic so that during the average peak hour of the average day, the level of service does not drop below Level D, a ratio of ninety percent of total capacity. This explained on page 13. Based on the background studies to the Plan, it has been calculated that when the area is fully developed, the Noyo River Bridge would not allow a volume of cars into the area at a level that would cause the intersections to reach LOS D.

4. Improvements

The Plan defines two major Plan area improvements (See Figure B on page 3). One is the construction of a realigned and greatly widened intersection with Ocean View Drive in conjunction with

an extended Boatyard Drive that loops to connect Highway 20 to Highway 1. The second improvement is a four-legged intersection at Highway 1 and Highway 20 that would extend Del Mar Avenue from Ocean View Drive past the college to Highway 20 and Highway 1. The Plan is based on these solutions in terms of general capacity and pending designs. All of these design concepts must have engineering drawings prepared and are subject to the approval of CalTrans and possibly the California Transportation Commission.

Under the current financial constraints in California, new development is being charged the cost of new infrastructure required to serve the new land use. However, new development can only be charged the cost of improvements that are directly attributable to the proposed project when it reaches its full development potential. This relationship is referred to as the rational nexus. The Plan establishes a program to divide the costs and apportion the funding for the improvements among public agencies and private development. The parcels which may be subject to this assessment, should one be developed, are shown in Figure C on page 6. It is important to note that while the single family residential parcels in Todd Point (Map Parcel 25) and the single family residential parcels in the Basin View Drive-Highway 20 area (Map Parcel 27) are identified for purposes of estimating traffic generation in the area, the parcels are not proposed for inclusion in any impact fee mitigation program or assessment district.

5. Existing Streets and highways

The Plan area has two State highways as the local arterial street network. Practically all travel is on these two routes, State Highways 1 and 20. There are two collector streets — Ocean View Drive and South Harbor Drive. Other local streets complete the network with Boatyard Drive and Del Mar Avenue carrying the most traffic (See Figure D for the Highway 1-Ocean View existing configuration and Figure E for Highway 1 and 20)

6. Land use and zoning

Each parcel within the Plan is within a zoning district consistent with the Land Use element of the City's General Plan and the Fort Bragg Local Coastal Plan. Figure F shows the zoning districts that apply to the Plan area to parcels within the city limits and the zoning districts applied by the County for unincorporated parcels. The primary districts relate to commercial development of various intensities. Within each zoning district, there are certain types of development that are permitted. These land uses are called "permitted uses," in that the person who owns the land has the ability to apply for a permit to operate a permitted use. In order to construct a building for a permitted land uses, the property owner must conform to the zoning district's development standards and any applicable development codes (including payment of required fees and charges). It is unlikely that a building permit would be turned down on the basis of a use allowed within the zoning district.

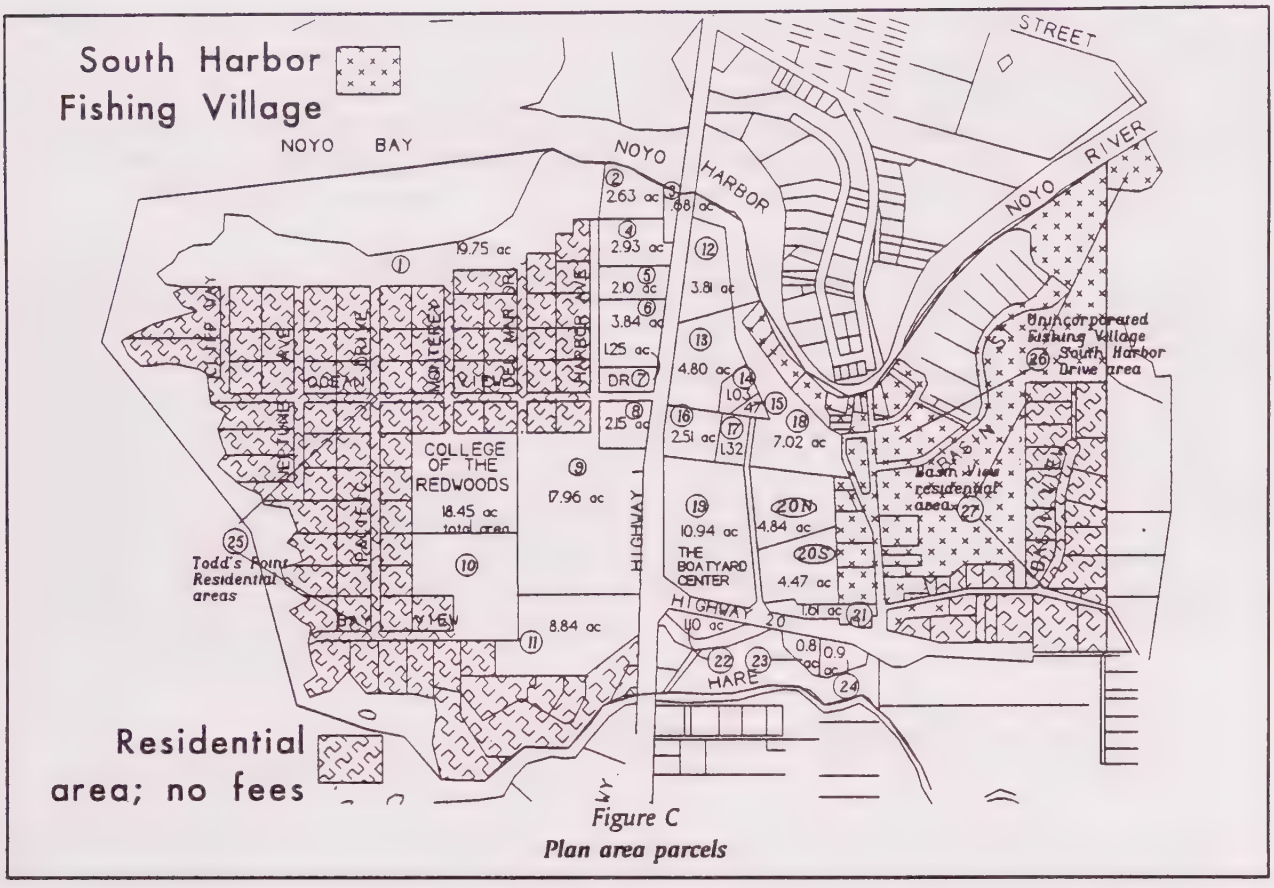

Figure C
Plan area parcels

Other uses may be assigned to a zoning district that generally meet the purpose of a zone, but require a more detailed review of the land use. These types of uses are called "conditional uses," and can only be allowed through the issuance of a conditional use permit by the City. Conditional use approval is at the discretion of the City Council, and is a "property privilege" rather than a use entitled directly by zoning.

For purposes of the Traffic Plan, only permitted uses were examined for each parcel. The purpose was to ensure that the allocation of traffic to each parcel was accomplished on the basis of the land uses that are permitted by the zones. Discretionary land uses that may be allowed through a conditional use permit will need to have traffic impacts assessed on a case-by-case basis in conformance with the policies of this element. Beginning in the following section, the differences between the traffic producing parcels and traffic attracting parcels are noted. Table 1 on page 10 lists

Explanation B: Maximum traffic

Maximum traffic is a projection of the total volume of traffic that may be generated by a land use developed on a parcel.

Zoning allows each property owner the ability to construct a certain number of residences or a structure to a certain size, provided that parking, landscaping, and building setback requirements are satisfied based on the parcel size.

By creating a formula of how much land area must be set aside for non-structure development, it is possible to calculate the largest building or highest residential density for a parcel. From this data, the traffic projections are generated.

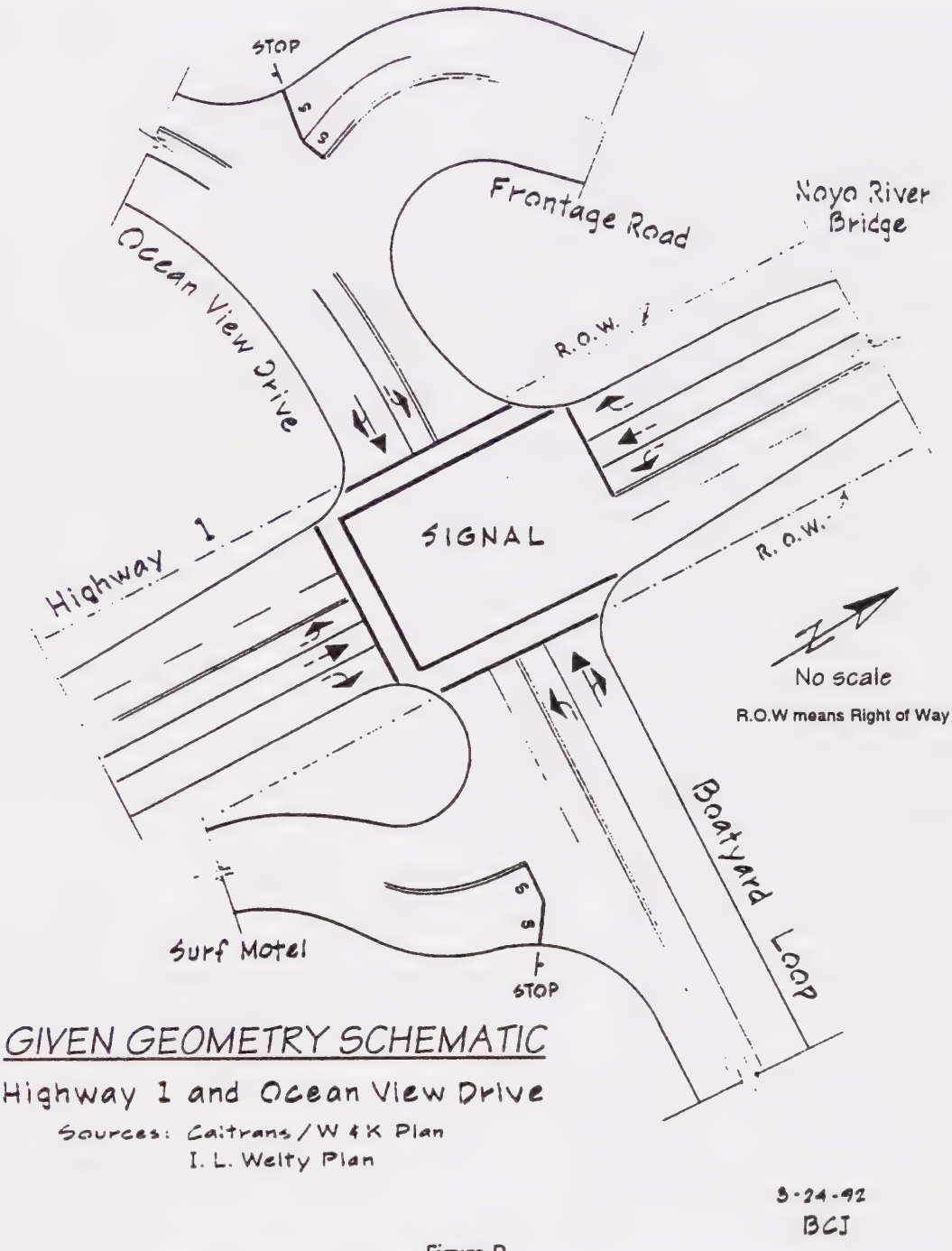

Figure D
Existing configuration: Highway 1-Ocean View Drive intersection

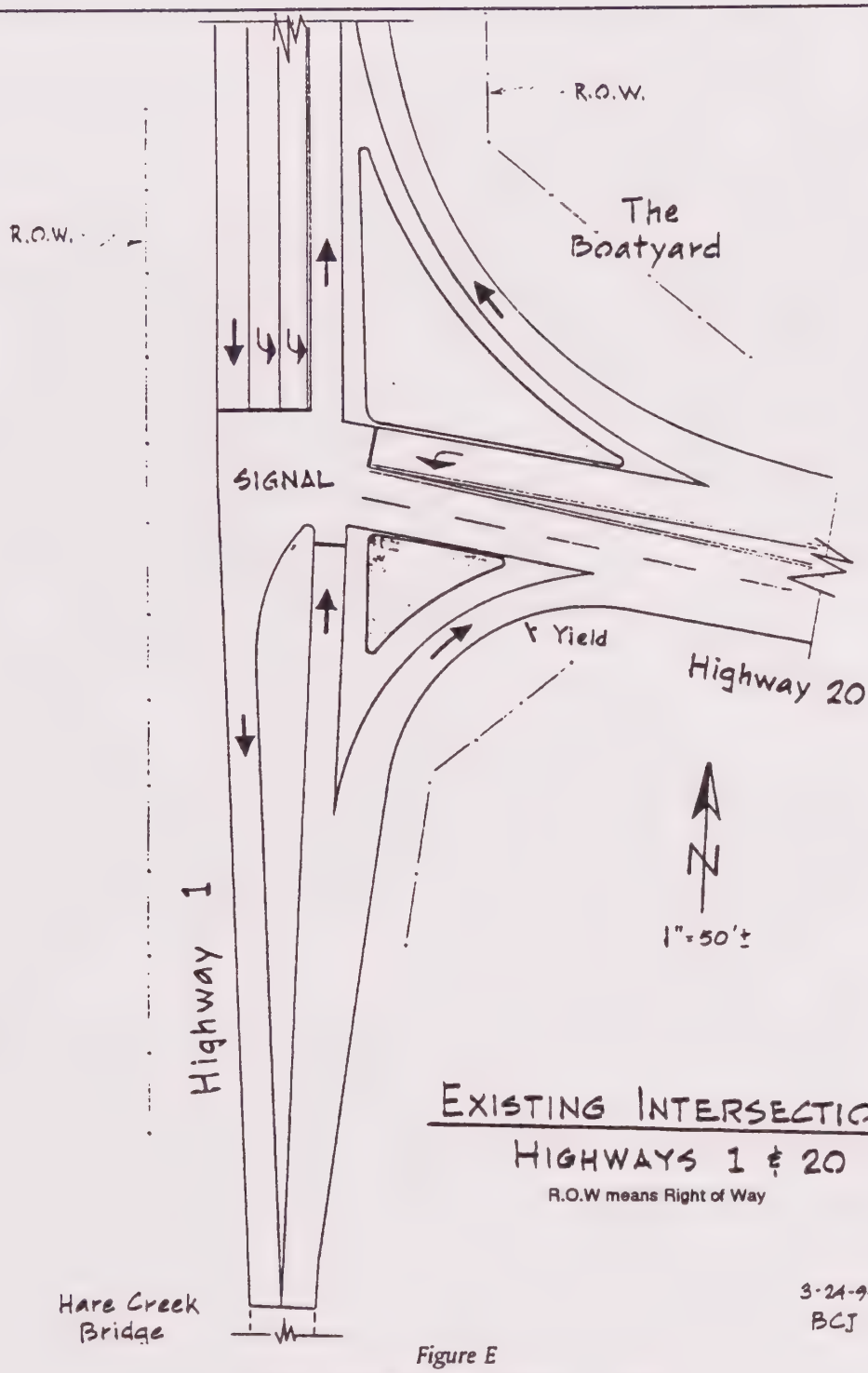

Figure E
Existing configuration: Highway 1 and 20

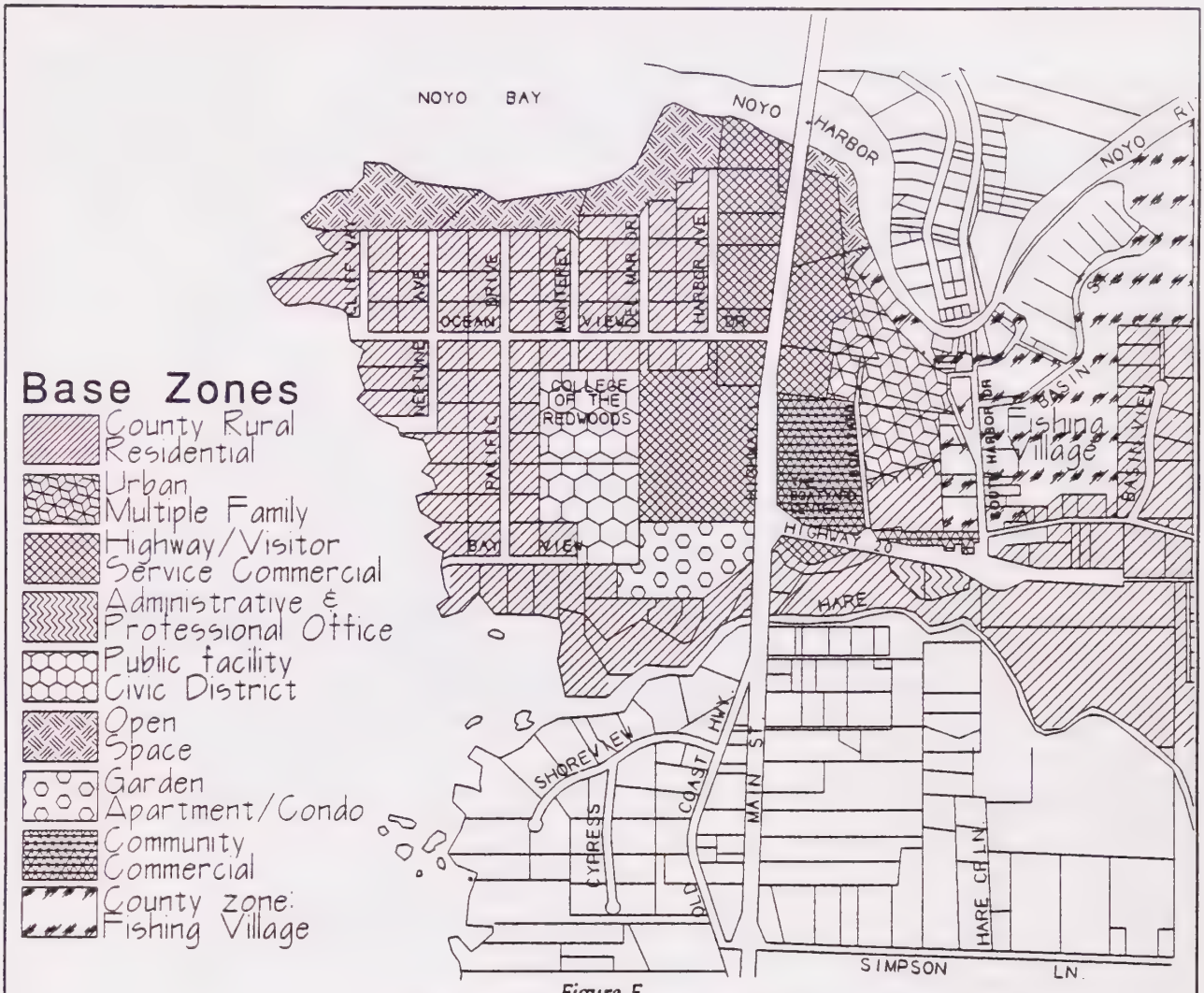

Figure F
Traffic Plan area: Existing zoning districts
Both City and County districts

each of the Plan Area's parcel with the existing or maximum development potential. This information was used as a constant in developing the traffic budget for each parcel.

Calculations were made projecting the maximum development potential for each parcel using the land development intensity permitted by the zoning code (See Explanation B). The results of those calculations showed that maximum development allowed more traffic to be generated than the capacity of the Plan area is capable of accommodating. For this reason, a Traffic Budget was establish for each parcel to allocated the potential traffic in the Plan area. The traffic budget for each parcel, which is listed in Table 6 on page 28, reduces the development potential of every parcel in the Plan area. Using the traffic budget allows each parcel to develop without the generation of more traffic in the area than there is capacity to handle.

Table 1: Parcels included for traffic projections

Refer to Figure C on page 6 for key to numbers

Map Parcel	*Acres*	*Zone*	*Number of units* / *Maximum new units allowed by zoning*	*Existing*	*Producer or Attraction*[a]
010	19.75	OS	80 RV spaces		P
020	2.63	HVC	44 dwelling units	44	P
030	0.68	HVC	12,601 ϕ new bldg	4,000 ϕ	A
040	2.93	HVC	(Included in parcel 2)		
050	2.10	HVC	39,000 ϕ new bldg	10,000 ϕ	A
060	3.84	HVC	71,200 ϕ new bldg		
070	1.25	HVC	76 rooms		
080	2.15	HVC	39,856 ϕ new bldg		
090	12.06	HVC	(See Note b below)		
100	18.45	PUB	3,600 students	300 FTE	A
110	8.84	GAC	(See Note c below)		
120	3.81	HVC	65,000 ϕ new bldg	5,700 ϕ	A
130	4.80	HVC	89,010 ϕ new bldg		
140	1.03	URM	25 dwelling units		
150	0.47	URM	11 dwelling units		
160	2.51	HVC	99 rooms	54	P
170	1.32	URM	32 dwelling units		
180	7.02	URM	169 dwelling units		
190	10.94	C-3	27,000 ϕ new bldg	75,000 ϕ	A
201(N)	4.47	URM	116 dwelling units		
202(S)	4.84	URM	30 mobile homes	30	P
210	1.61	URM	39 Dwelling Units		
220	1.10	HVC	16,000 ϕ Bldg	5,000 ϕ	A
230	0.80	HVC	23 Rooms		
240	0.90	HVC	30 Rooms		
250	Rural Residential[d]		68 Dwelling Units	35	P
260	Fishing Village[d]		See Note e below		P, A
270	Rural Residential[d]		35 Dwelling Units	28	P

Total average daily traffic from maximum new zoning intensity

Parcel numbers are the left two digits (010 = Parcel 1 on the map; 100 = Parcel 10) The third digit is used when a parcel has multiple land uses (Parcels 090, 110, 200, and 260) on the traffic tables

Note a: See Explanation C on page 19.

Note b: The development is 100,000± square feet of retail space and a family dining restaurant. This is based on an early project proposal submitted for the property.

Note c: Projections based on 60 units of low rise apartments, 80 units of motel, and 4,000 square feet of fast food; an early proposal.

Note d: County land use designations, Mendocino County Local Coastal Plan.

Note e: The Fishing Village is projected currently as mixed uses, including residential with access to South Harbor Drive (50 units); industrial (total of fish and food processing, 200,000 sq ft); coastal commercial (restaurants, small; retail, <50,000 sq ft). New maximum development is estimated as no residential, 50,000 square feet of harbor (light) industrial, and <50,000 sq ft of coastal commercial or passive recreation. *These data are assumptions for analysis, and not a zoning allocation.*

7. Traffic data used in preparing the Plan

A considerable amount of traffic count data has been reviewed for this study. Both Caltrans and local machine counts obtained for this study have been analyzed for seasonal, daily, and hourly patterns. Representative count data can be found in the Technical Appendix Binder which is retained as a reference by the Planning Department as the foundation for the characteristics presented here.[2]

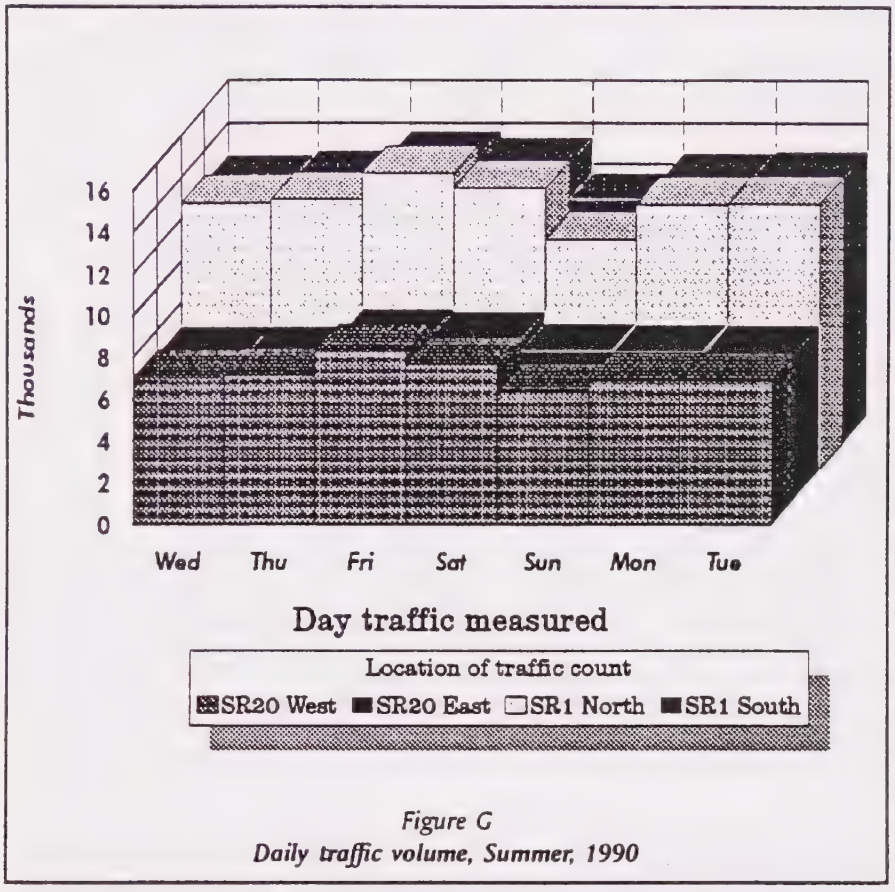

Figure G
Daily traffic volume, Summer, 1990

a. Traffic Volumes

Traffic volume data are contained within the Traffic Data Appendix binder. A summary of the average daily traffic and peak hour data for a typical week, including a year's worth of CalTrans data, is contained in Table 2 and Table 3 on page 12. In addition to traffic volumes, a sampling of heavy vehicles on Highway 1 and Highway 20 showed them to be about 3% of the traffic stream. This level is lower than normal which Caltrans estimates at 5% for Highway 1 and 10% for Highway 20. The volume of trucks and recreation vehicles has an affect on traffic capacity, because the vehicles tend to slow passenger cars.

The 1990 traffic volumes on Highway 1 (Table 2) and Highway 20 (Table 3) show a peak season week of traffic volume in each direction on both highways. These data show that traffic volume on a daily basis is relatively constant throughout the week, peaking on Fridays. AM Peak Hour is not the traditional "morning go to work" period, but actually tends to fall around noon. PM Peak Hour tends to occur between 3:00 and 5:00 p.m.

[2]The Technical Appendix to the Traffic Plan is a three ring binder containing all of the raw traffic data, calculations, and assumptions. This report, though not published, is a part of the public record, and is available for review and duplication from the Fort Bragg Planning Department.

Table 2: Highway 1 daily traffic volume, north of Ocean View Drive

	Northbound Hwy 1 North of Ocean View Dr			*Southbound Hwy 1 North of Ocean View Dr*			*Hwy 1 Totals North of Ocean View*		
	ADT	AM Peak	PM Peak	ADT	AM Peak	PM Peak	ADT	AM Peak	PM Peak
Wed	12,787	909	1,050	12,488	811	1,069	25,275	1,720	2,099
Thu	12,954	972	1,083	12,708	869	1,071	25,662	1,841	2,121
Fri	14,205	1,029	1,128	13,627	930	1,123	27,832	1,959	2,251
Sat	13,494	1,073	1,070	13,355	956	1,089	26,849	2,029	2,159
Sun	11,042	817	959	11,635	924	1,010	22,677	1,741	2,080
Mon	12,730	938	1,021	12,577	890	1,097	25,307	1,828	2,056
Tue	12,776	940	1,010	12,683	915	1,103	25,459	1,855	2,124
Avg	12,855	7.4%	8.1%	12,725	7.1%	8.5%	25,580	7.2%	8.2%

Table 3: Highway 20 daily traffic volume near Highway 1

	Westbound Hwy 20 near Hwy 1			*Eastbound Hwy 20 near Hwy 1*			*Hwy 20 totals near Hwy 1*		
	ADT	*AM Peak*	*PM Peak*	*ADT*	*AM Peak*	*PM Peak*	*ADT*	*AM Peak*	*PM Peak*
Wed	7,057	514	583	6,884	470	542	13,941	984	1,125
Thu	7,136	505	642	6,880	527	595	14,016	1,032	1,237
Fri	8,311	542	672	7,712	508	615	16,023	1,050	1,287
Sat	7,688	558	643	7,591	547	584	15,279	1,105	1,227
Sun	6,400	448	538	7,033	525	565	13,433	973	1,103
Mon	6,954	506	577	7,012	515	581	13,966	1,021	1,158
Tue	6,935	478	567	6,941	511	577	13,876	989	1,144
Avg	7,212	7.0%	8.4%	7,149	7.5%	8.1%	14,361	7.2%	8.2%

b. Bridge capacity

The Hare Creek and Noyo River bridges are restricted sections of Highway 1 with capacities less than ideal because of the constrained width and the no-passing regulation. The best estimate of capacity for the bridges will be maximum observed flow rates reflecting actual Fort Bragg conditions of heavy vehicle mix, weather, and seasonal pressures on driver behavior. The actual number of vehicles per hour are the subject to interpretation and discussion. The engineering studies conducted for the Traffic Plan have determined that a supportable bridge capacity of 1,600 vehicles per lane per hour at Level of Service E. CalTrans has indicated that the Noyo River Bridge maximum capacity is 1,150 vehicles per lane per hour in a letter to the City.[3] Previously, in a 1989 letter to the City's Engineering Firm, Winzler and Kelly, CalTrans reported the capacity to be 1,300. Following receipt of the CalTrans April, 1992, letter, additional traffic counts were performed during peak hours on the

[3]Telephone conversation between Barnard C. Johnson, Traffic Engineer, and John Tatum of CalTrans, February 20, 1992; letter from Patricia Secoy of April 13, 1992.

Noyo River Bridge in May, 1992, which showed traffic running at hourly per lane rates of between 1,675 and 1,835 vehicles per hour.[4]

The Plan's traffic allocation projects that by the time all of the Plan area parcels in the vicinity are developed there will be a peak hour traffic flow onto the Noyo River Bridge of 1,580 vehicles per hour. This is a volume that can be accommodated. This projection is based on a reduction in allowable development intensity for each parcel from the level allowed by zoning.

The construction of the East Side Local Traffic Byway, which is a long-term planning period Circulation Element program could provide some relief by taking local traffic from the peak hour flow. The effect of this project is not included in any of the calculations related to the Traffic Plan.

The Hare Creek Bridge capacity should be similar to that of the Noyo River Bridge, but traffic volumes are lower and do not indicate bridge capacity being reached. In effect, the Hare Creek Bridge can carry more traffic.

c. Intersection level of service

(1) Level of service in general

Level of Service (LOS) is defined as a qualitative measure describing operational conditions within a traffic stream and their perception by motorists. A LOS definition generally describes these conditions in terms of speed, travel time, freedom to maneuver, comfort and convenience, and safety. Six levels of service are defined for each type of facility where analysis is possible. They range from A to F with LOS A representing the best conditions and LOS F the complete breakdown of the system, commonly called gridlock.

To provide a base from which capacity could be calculated and parcel traffic allocated, the City Council directed that Level of Service (LOS) D would be the traffic threshold established for intersections in the Plan area. LOS D shows delays of 25.1 to 40.0 seconds per vehicle and a volume-to-capacity ratio (V/C) of 0.81 to 0.90. There will be short intervals, around 15-minutes on some days, when capacity flow may occur. The whole peak hour, however, will average out at LOS D and a V/C ratio of 0.90.

Level of Service (LOS) D means that during the peak hour of the day, a ratio is established that is based on setting a goal that as measured through the peak hour, the number of vehicles passing through the Traffic Plan area is equal to 90% of the capacity of the intersections. LOS A occurs when the number of vehicles passing through an intersection is equal to 60% of the capacity or less. LOS B is from 61 to 70 percent. LOS C is from 71 to 80 percent of capacity. LOS D is from 81 to 90 percent of capacity. LOS E is from 91% to full capacity.[5]

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[4]Traffic field observations on May 20, 1992 by Barnard C. Johnson, Traffic Engineer.

[5]Institute of Transportation Engineers.

(2) Highway 1 and 20 level of service

This "┬" intersection operates very efficiently with an actuated signal controller allocating time based on the presence of vehicular traffic. "Green" time changes to meet the demands of traffic and if there is no traffic on the minor phases, that phase is skipped. Free right turns for northbound Highway 1 and westbound Highway 20 are not controlled by the signal. Therefore, critical phase movements are the southbound left turn movement from Highway 1 to eastbound Highway 20, northbound Highway 1 through movement, and the westbound left turn movement from Highway 20 to Highway 1.

The capacity of this intersection is about 1,720 pcph totalled for the three critical movements described above. During a peak hour on Friday, the adjusted volume for these movements is about 1,030 pcph (V/C = 0.60) and the level of service is at LOS B—C, delay of about 20 seconds per vehicle. Various calculations have shown the level of service to be in the B—C range using the operational method of evaluation which takes in to account the factors mentioned above.

Current studies by Mendocino County (the DKS study) for Highway 1 corroborate a LOS of "C" and a V/C ratio of 0.76. A further check made of vehicle delay at the intersection indicated LOS B as the operating level with delay at about 14 seconds per vehicle.

There have been previous studies of LOS for this intersection by Winzler-Kelly indicating a worse condition at LOS E—F or Approaching Capacity as in the Caltrans HCM Planning Method. In one instance, the assumed volumes and assumed signal operation did not check with actual conditions. In the other, a planning level analysis was used assuming a directional split of 60:40 instead of the 50:50 actually present.

A delay study in July 1990 showed this intersection operating at LOS B with 13.6 seconds per vehicle for a Wednesday PM peak hour. Another sample in June 1990 for the southbound left turn showed LOS D and 32.6 seconds/vehicle (s/v). This shows that on occasion the intersection experiences tolerable delay but overall a good level of service prevails.

(3) Highway 1 and Ocean View Drive estimated level of service

The relocated intersection is controlled by a traffic signal for eastbound Ocean View and westbound traffic from the driveway for the Surf Motel. The newly installed traffic light has not had a level of service calculation prepared. However, based on the traffic projections developed for the overall Plan area, it would appear that during peak hours, intersection operates at LOS D or E. There has been an increase in the number of vehicle accidents at this intersection, which is presently being investigated.

(4) Highway 20 and Boatyard Drive segment level of service

The Boatyard Center intersection generally operates at LOS A except for the southbound left turn out of Boatyard. Again, it is often difficult to enter Highway 20 from this left turn. When analyzed as if signal controlled, the V/C is 0.25 for a LOS of A.

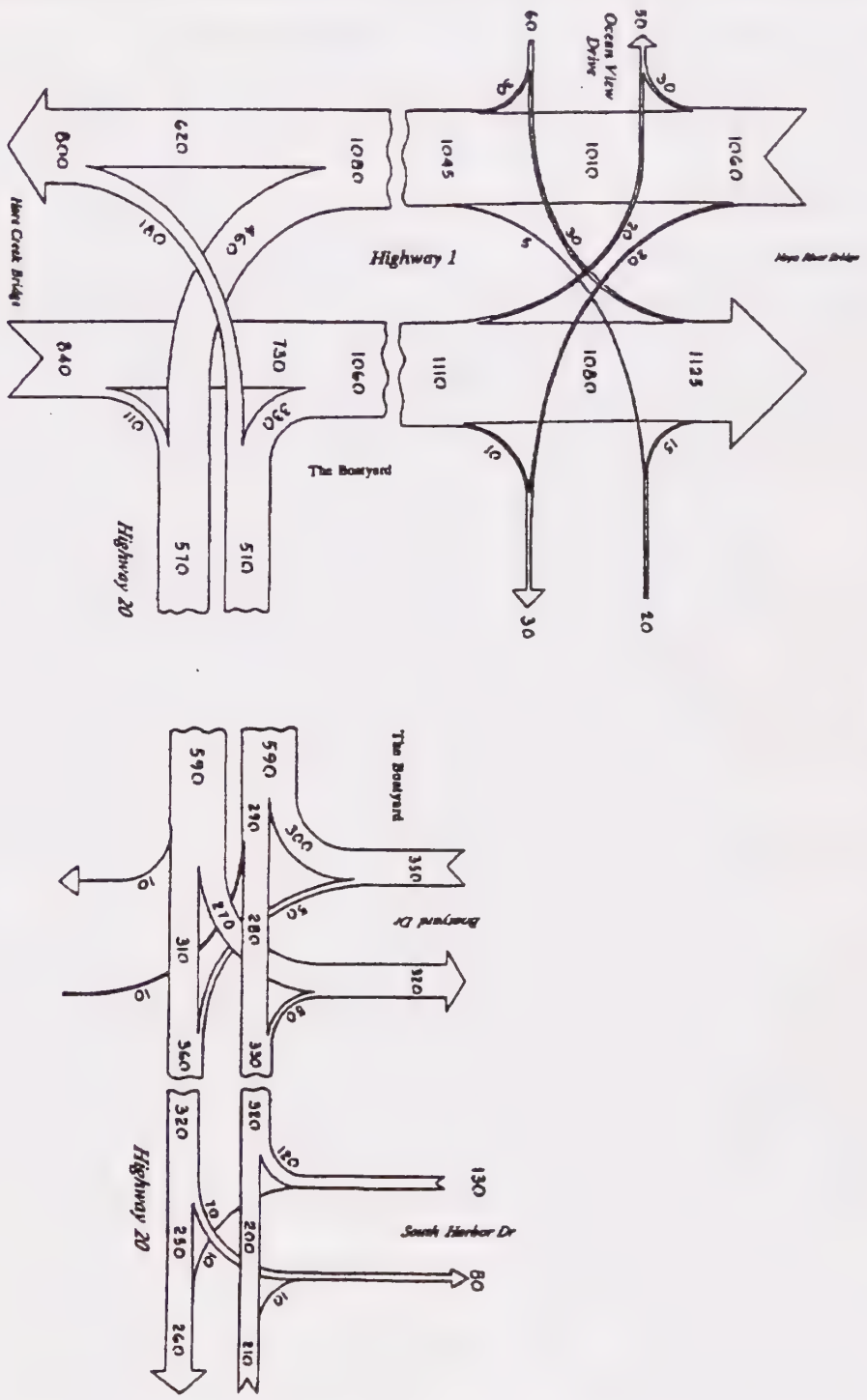

Figure H
Area traffic patterns, Summer, 1991

(5) Highway 20 and South Harbor Drive level of service

This intersection is at LOS A with little difficulty experienced for any maneuver.

d. Traffic Growth

The Caltrans twenty-year growth rate estimate for Highway 1 is 1.4 and for Highway 20 is 1.7.[6] This means that the Department of Transportation anticipates that traffic will increase forty percent over current volume during the next twenty years, approximately two percent annually. The change on Highway 20 is a seventy percent increase over the next two decades, over three percent per year. The County Highway 1 Capacity Study assumes that all new travel on Highway 1 would come from new dwelling units and tourist travel based on Bay Area population growth. The basis is that practically all travel can be traced to trips generated to and from residential units, whether it be for work, shopping, school, or similar trips.

The County study is projecting that new non-residential development will not result in the creation of any new traffic on Highway 1 unless there were new homes in the area and an increase in visitor travel. This concept, while it may be appropriate to projecting general changes in traffic volume for the length of Highway 1 in Mendocino County, is not an effective model for the Traffic Plan area. This approach, which is adequate for a generalized traffic plan, understates traffic based on the precise study of the Plan area. The County study, because it underestimates traffic volume, is not used in the Traffic Plan.

8. Traffic impact analysis

Of more interest in managing traffic are the turning movements at each study intersection. Figure H on page 15 shows a flow diagram that is scaled to the magnitude of traffic volume so the major and minor movements can be perceived at a glance. Routes Highway 1 and Highway 20 dominate with access to the Boatyard Shopping Center being a relatively large portion of overall traffic flow. This figure shows volumes for a summer Friday PM peak hour. Pedestrian and bicycle volumes are very low on both Highway 1 and Highway 20. Experience with special events such as the annual salmon barbeque increases pedestrian volume for short periods but still at low levels. For the barbeque, a shuttle bus system is used between parking at the college and the south harbor area.

a. Trip Generation Studies

Field counts were obtained as a check on traffic generation rates for the College, Boatyard Center, Surf Motel, and Todd Point residential. The Surf Motel checked out at 8.6 trips per day, within the

[6]To make the calculation, the current volume of traffic is multiplied by 1.4 for Highway 1 or 1.7 for Highway 20.

Table 4
Proportional Critical Lane Volume Traffic Allocation

Parcel	Ocean View-Hwy 1		Highways 1 & 20		Boatyard-Hwy 20		S Harbor-Hwy 20	
	Total	CLV	Total	CLV	Total	CLV	Total	CLV
10	21	5	21	9	5	3	5	3
50	46	18	52	26	24	12	24	12
60	64	29	60	30	26	13	26	13
70	39	10	14	8	4	2	4	2
80	64	21	44	22	20	10	20	10
91	106	53	238	72	56	28	56	28
92	15	7	33	12	5	3	5	3
93	4	2	6	2	2	1	2	1
94	22	11	74	27	11	6	11	6
95	17	7	37	11	9	5	9	5
100	118	33	98	23	98	23	34	24
111	6	2	14	4	2	1	2	1
112	49	19	86	28	13	8	13	8
113	9	4	64	23	9	5	9	5
114	32	16	104	39	16	8	16	8
120	18	9	28	14	12	6	12	6
130	92	46	56	28	30	15	30	15
140	4	3	2	1	4	2	2	1
150	2	1	2	1	4	2	2	1
160	38	20	15	8	7	4	6	4
170	6	4	3	1	5	3	2	1
180	29	19	12	4	20	11	8	5
190	43	13	51	34	72	44	21	10
201	21	14	9	3	14	8	5	3
210	6	2	9	5	9	3	1	1
220	5	1	13	7	15	0	2	1
230	12	5	17	9	17	7	3	2
240	15	6	22	12	22	9	4	2
250	30	7	14	9	6	4	6	4
261	11	4	16	9	16	6	18	16
262	9	8	43	15	43	37	44	43
263	52	26	138	69	138	69	150	138
270	4	1	6	4	1	1	7	6
Total	1,009	426	1,521	689	755	379	579	408

travel estimates at entrances and exits to the Plan area. These calculations made it possible to double-check the impact of traffic on the two bridges.

Caltrans estimate of 8-9 trips per day. The Boatyard checked out at 92 trips per day per 1,000 square feet. The balance of the parcels were estimated at rates in the Fifth Edition of Trip Generation by ITE.

b. Trip Distribution

The general pattern of travel in the area can be estimated from local turning movement counts. These studies lead to a reasonable travel pattern with 60% to/from the north to, 15% east, and 25% south. For retail uses, 2% has been allocated west for Todd Point and 58% north. Travel for each parcel is distributed to the street and highway network using these percentages.

c. Trip Assignment

Actual allocation to specific streets is the assignment process considering relative travel time and route continuity. It is the assignment process that develops specific turning movement allocations for intersection analysis. This assignment assumed completion of the Boatyard Loop Road, the extension of Del Mar Drive from Ocean View Drive to Highway 1, and the frontage roads on each side of Highway 1 north of the new Ocean View-Boatyard intersection. Traffic was assigned to the street network using the SITE model software of Strong Concepts, Inc., and distributed by the University of Florida. This model calculates trips based on the land use assumptions and distribution to possible travel paths for an accumulation at each intersection. The resulting turning movements are then used directly for capacity calculations.

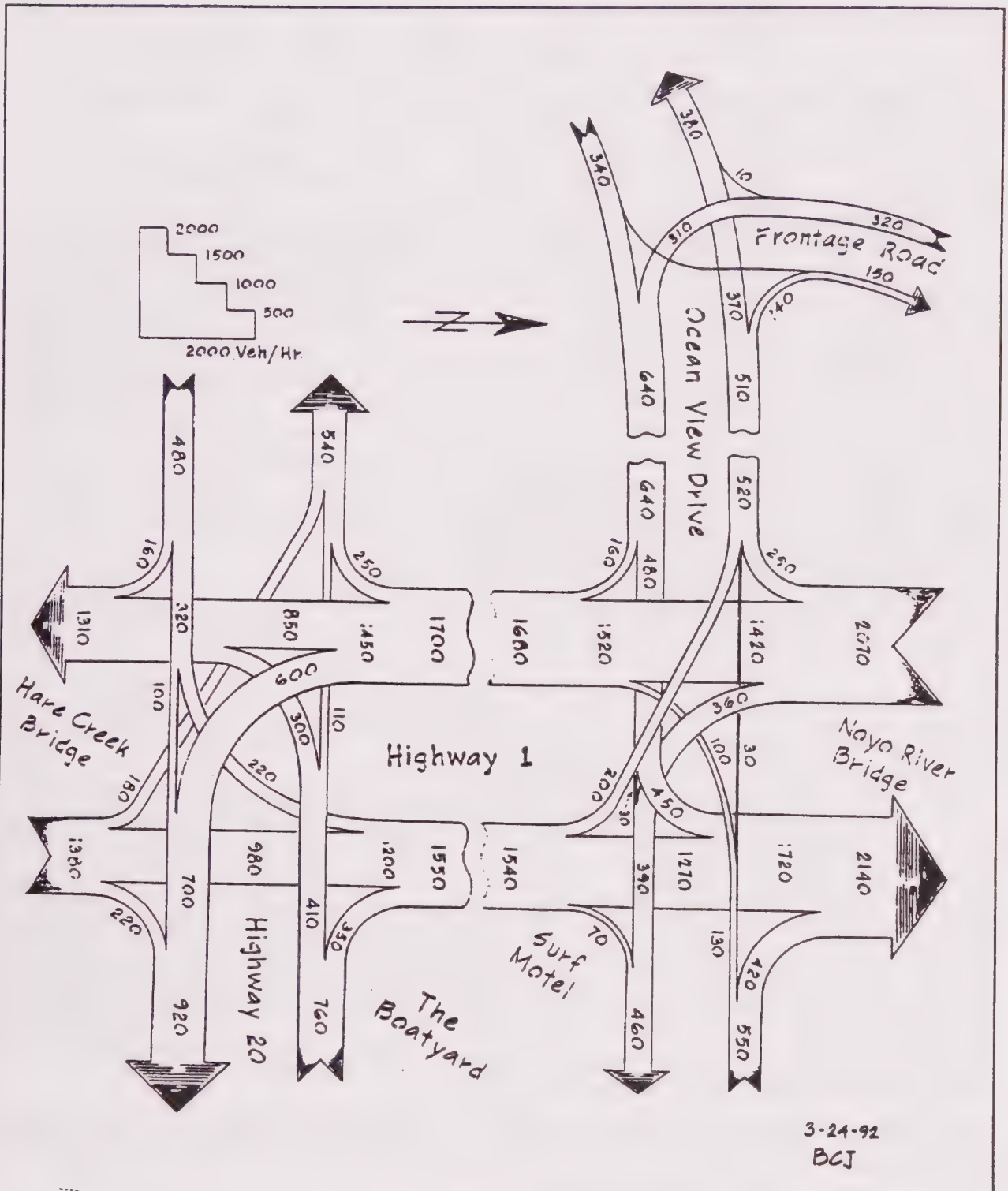

Figure 1
Traffic projection — Year 2000 Final Traffic Budget/Average Daily Traffic

d. Pass–By Trips

A certain portion of generated trips for some land uses will come out of the traffic already on the adjacent street system. Existing data show this portion varying from 45-60% for shopping centers under 100,000 square feet in size. The larger the center the lower the percentage of pass-by trips and the higher the percentage of primary trips destined to the specific parcel. The pass-by effect has been estimated in the Fort Bragg evaluation based on the ITE research distribution. and is assumed at a level of forty percent of the total attractions. When considering pass-by trips, the entering driveway counts remain the same and some exiting movements are reassigned to continue along the route rather than return to place of origin.

Explanation C Traffic attractors and producers

Traffic attractors are land uses that function from traffic coming to the land use. Because this type of land use is a destination, it is considered an attraction to traffic. Examples include shopping centers, schools, and medical offices.

Traffic producers are land uses where traffic is generated from the land use. This type of land use is a traffic origin so it is considered a traffic production point. Examples include residences, motels, apartments, and campgrounds.

Pass-by traffic is traffic that intends to move through the area from the vehicle's point of origin to its ultimate destination. Pass-by traffic tends to stop at the attractive land use. Many businesses, especially in recreation areas, function on an assumption that substantial portions of through traffic will make an impulse decision to stop, thus becoming a pass-by trip ("Let's pick up some more munchies before we head up the Coast;" "I didn't think it would be this cold in August, let's buy some sweaters;" "Mommy, I have to go to the bathroom").

e. Development results for new traffic

Traffic volume for each parcel was distributed by direction and assigned to specific routes through the system based on peak hour traffic, not average daily traffic.[7] Cumulative traffic projections for each intersection were analyzed at the critical locations. The assessment provides a projection of what impacts traffic from new development will have during peak hours. The three main intersections analyzed were Highway 1 and Ocean View, Highway 1/Highway 20, and Highway 20 and South Harbor. Without even developing detailed calculations, it became readily apparent that the maximum development level was too intense for Highway 1 and Ocean View and for Highway 1/Highway 20. Allowing development as permitted by zoning in terms of population density and building intensity was not feasible.

The capacity calculations were based on both the current number of lanes and the future lane configurations and alignment, as well as the type of traffic control. The large portion of retail use along Highway 1 adversely affects this intersection. It emerges as the critical intersection for the area raising questions about the planned design and the proximity of planned frontage roads.

[7]The data used for these calculations are included in Traffic Appendix Binder maintained at the Fort Bragg Planning Departmnet.

Using the maximum amount of development possible for each parcel in the Plan Area, the traffic was calculated for a threshold called maximum build-out. This generated far more traffic than the intersections in the area could handle. An adjustment was made using an assumption that once each parcel were to be developed, it was likely that the parcels would be developed to about sixty percent of the maximum potential. This percentage differs by parcel, but the average about sixty percent. The second figure, called credible build-out, still showed traffic in excess of area capacity. The next step in the process was to divide the parcels' land uses into producers and attractors, and to use accepted engineering practices to calculate the pass-by traffic. When this calculation was completed, all of the parcels were assigned reduced development intensities. The reduction in development potential ensured that none of the intersections in the Plan Area would have a level of service at less than D (0.90 volume/capacity ratio) even when all the parcels were developed. This reduced traffic budget, which maintained the LOS D at Plan area intersections, was to have been the assigned traffic budget.

The last check was to examine how much traffic was going to be using the Noyo River Bridge during the peak hour. Even with the various reductions to ensure that Plan area intersections would be at level of service D or higher, there was too much traffic potential on the Noyo River Bridge. The traffic budget that is assigned to each parcel is based on a reduction in traffic in order to ensure that the peak hour traffic on the Noyo River Bridge will not exceed 1,600 vehicles per hour in either of the two lanes. When this objective is met, none of the intersections within the Plan area have the potential of dropping below LOS D. By the time all parcels are developed, the Noyo River Bridge will be at Level of Service E — its maximum capacity — during the peak hour.

The next section of the Plan discusses the improvements within the Plan area that are designed to maintain intersection levels of service of D or higher.

9. Road improvements

a. Highways 1 and 20

With proposed new development for the areas west of Highway 1, the existing intersection with Highway 20 will no longer be adequate to meet the scale and intensity of proposed development. The existing intersection design (See Figure E on page 8) provides free flowing right turn lanes tp eastbound on Highway 20 and to northbound on Highway 1. There are two left turn lanes from Highway 1 to Highway 20 east.

The original design proposal to accommodate development on the west side of Highway 1 proposed a mirror to the existing configuration with sweeping lanes from Highway 1 to the extension of Del Mar Drive and a sweeping southbound lane from Del Mar onto Highway 1 at the Hare Creek bridge. Northbound traffic on Highway 1 would have one left turn lane to Del Mar Drive and one northbound through lane. After consideration of the traffic projections and development potential, the Plan recommends that a configuration with a four-leg total of 12 lanes be developed to move traffic from the Hare Creek bridge into the Plan area with as few constraints as possible. Figure J on

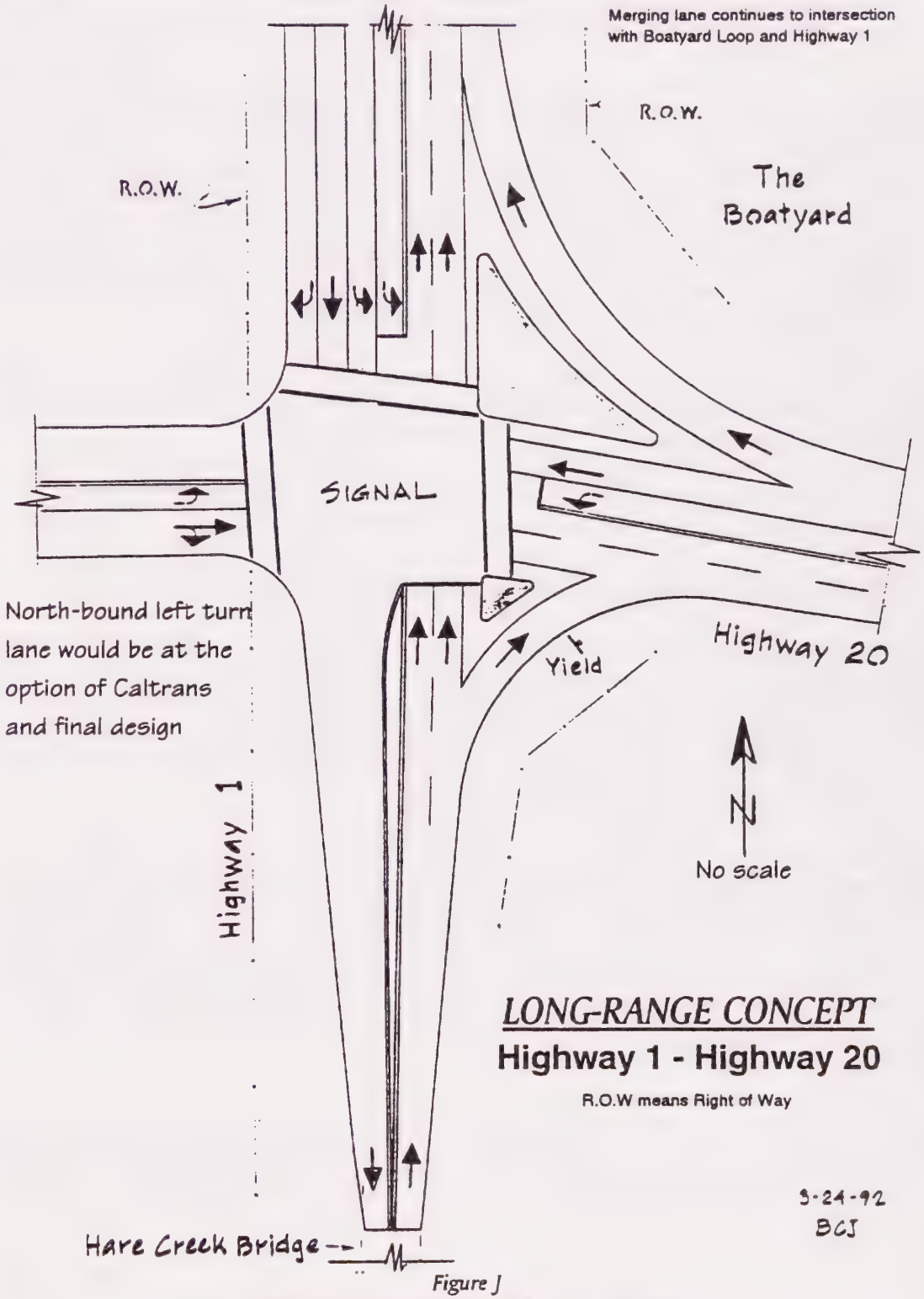

Figure J
Proposed intersection of Highways 1 and 20

page 21 shows the proposed intersection. Caltrans has made no commitments to accept this configuration or design. It must be engineered and submitted to the State for its approval.

Northbound traffic on Highway 1 would retain the free-flow right turn lane to eastbound Highway 20. Based on preliminary designs for the Highway 1 and 20 intersection, it appears that a northbound left turn is not feasible because of the short distance between the end of the one lane bridge and the intersection stopping points. This means that there may be inadequate room to queue cars wanting to make a left turn onto the new extension of Del Mar Drive. While the conceptual plan in Figure J shows two lanes would move northbound traffic through the intersection and no left turn lanes, the final decision will be developed when the actual intersection design is completed. Ultimate review of the intersection design rests with Caltrans. The intersection of Highway 1 and 20 may include a northbound left turn lane if such a proposal meets Caltrans requirements.

The freeflowing right turn from westbound Highway 20 to northbound Highway 1 would remain. Optionally this could be constructed into a longer lane that would provide a right turn lane at Boatyard and Highway 1 (see next section).

For southbound Highway 1, two turn lanes would remain to eastbound Highway 20, one right turn lane would be added to Del Mar Drive, and through traffic would remain at one lane.

b. Highway 1 at Ocean View and Boatyard Loop

This intersection is the critical intersection in terms of Plan area traffic. In 1992, the City completed construction of an "S-curve" (See Figure D on page 7) realignment of Ocean View Drive to match with the proposed extension of the Boatyard loop. The major problem is that in order to meet the goal of moving as much traffic into and through the Plan area, the intersection is too small to handle the volume of traffic that can be readily projected. The frontage roads on both sides interfere with stacking distances at the intersections.

Using the credible build-out traffic projects with allowances for pass-by and duplicate traffic generation, the minimum configuration of this intersection that will be effective is a design with a cumulative total of 14 lanes. Figure K shows this design. Southbound Highway 1 will have one left turn lane to Boatyard Loop, one right turn lane onto Ocean View Drive, and two through lanes. Northbound Highway 1 will have a right turn lane onto Boatyard Loop that connects from the right merging lane of northbound traffic from Highway 20, one left turn lane onto Ocean View Drive, and two through lanes. The left turn lane, however, provides an enlarged stacking distance. Phased signals can keep that queue from filling in most situations.

Ocean View Drive will feed two left-turn lanes to northbound Highway 1 with one combined through and right turn lane. Boatyard Drive will have two right turn lanes to northbound Highway 1 and a combined through and left turn lane. The signal at the intersection will need improvements to handle this phasing and resized intersection.

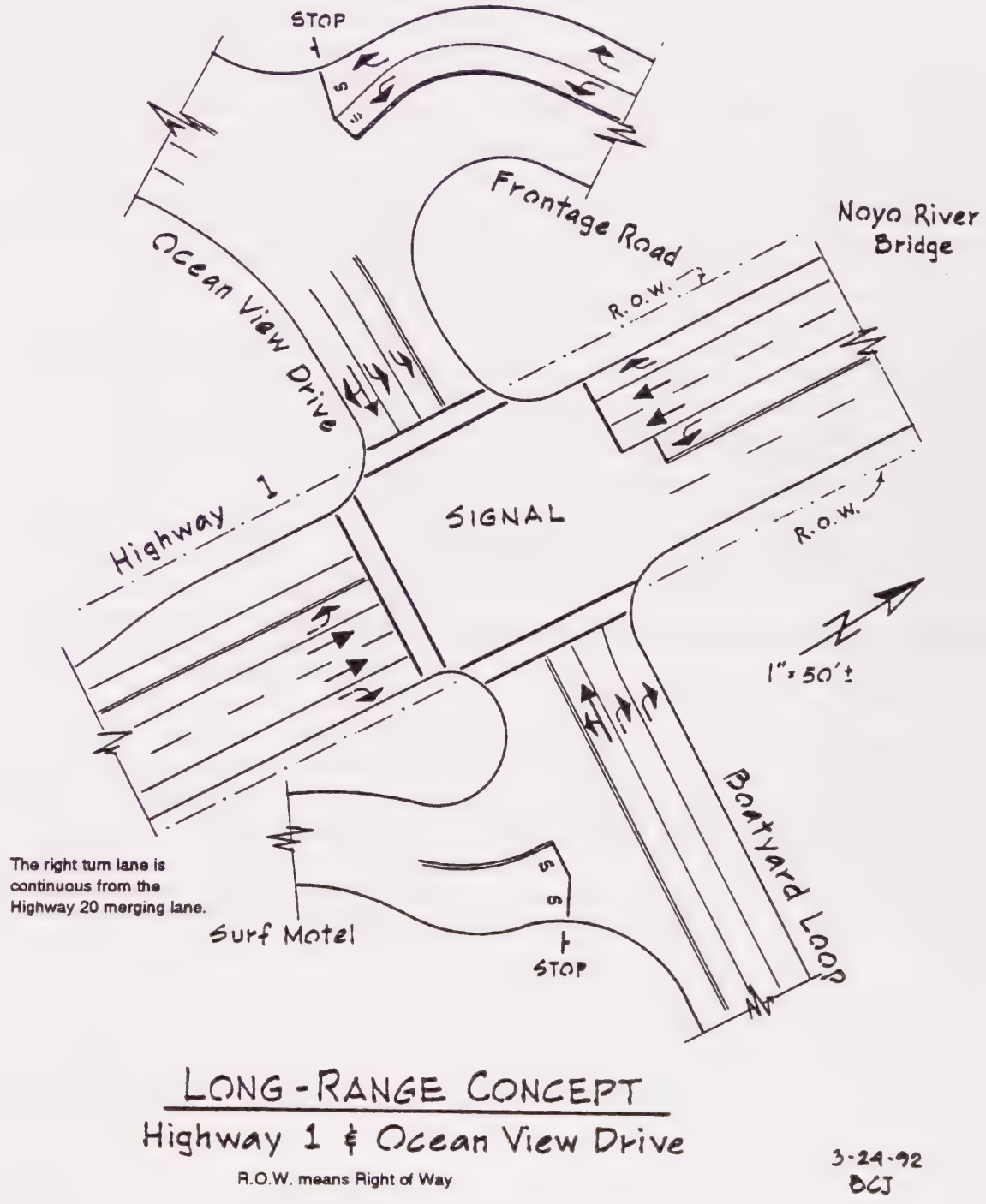

Figure K
Proposed configuration of Highway 1-Ocean View-Boatyard

c. Sharing costs

The cost of constructing each of these intersections, and some minor improvements needed to Highway 20 at Boatyard Drive, will need to be apportioned between parcels in the incorporated area and the unincorporated area. Table 4 on page 17 identifies how traffic from each parcel is distributed into all four intersections. The percentages shown in Table 5 on page 25 represent the proportion of the critical lane volume that each assigned land use on a parcel generates. When engineering drawings are completed, and costs are identified for this area, the impact fees or assessments can be established based on the percentage contribution of traffic to each intersection from each parcel. As stated throughout the Plan, the City has committed that individual single family residents on existing single family-zoned parcels will not be a part of the assessment district or pay any road improvement related impact fees. The City bases this commitment on the fact that the road network as it exists now is adequate for those existing and future residences.

Explanation D: Cumulative traffic impacts and the Traffic Plan

CalTrans' letter of April 13 questions the relationship of the traffic plan to an assessment of cumulative traffic impacts. The entire thrust of the Traffic Plan is to address cumulative traffic impacts. Using CalTrans data, growth rates for traffic generated outside of the Plan area have been added to the existing traffic levels. The reserve capacity that was remaining after existing and natural traffic growth remained was the traffic volumes distributed to area parcels.

The distribution of traffic, though directed towards peak hour (Friday summer peak hour), was allocated on the basis of critical lane movements. These data accommodate the potential reductions in capacity or level of service caused by turning movements. Traffic projections are still an art, rather than a precise science, but it is believed that the allocations take into account the greatest number of factors to maintain a level of service of D within the Plan area intersections over the life of the Plan (ten years).

For example, Parcel 010 (shown on Figure C as Parcel 1) could have additional recreational vehicle camping capacity would add 1.20% of the traffic to the critical lanes at the intersection of Ocean View and Highway 1. When the total costs are determined for building this intersection, Parcel 1 would be responsible for 1.20% of the expenditure. Additionally, the proponent developing the parcel would also pay 1.62% towards Highway 1 and 20, 0.85% to Boatyard and Highway 20, and 0.79% to South Harbor and Highway 20. If the improvements cost $100,000 per intersection, the developer of Parcel 1 would pay $1,200, $1,620, $850, and $790 for a total of $4,460 in proportional share of the cost.

d. Financing improvements

The Local Coastal Plan policies called for the formation of an intersection improvement district. This type of district does not appear to be covered in California law. There are a number of more realistic options in addition to or instead of forming a district.

The direction of the Plan is to allow flexibility in selecting a financing mechanism. However, the policies call out that no building permits can be issued until that financing mechanism is in place. The central options appear to be impact fees, benefit assessment district (including Mello Roos), first-in-

pays-gets-reimbursed-later (FIP-GRL), or first-in-pays-as-a-loan (FIPAAL).

Impact fees are generated by projecting the cost of designing, permitting, and constructing the improvements, and then collecting the cost at the time a building permit or other entitlement is approved. The City would hold the funds and then construct the improvements when enough money has been collected.

A benefit assessment district, like any special assessment district, funds the improvements by selling bonds that are paid back from monies collected from property owners on the basis of an equitable assessment.

The FIP-GRL system requires that the first developer pays for the full cost of improvements that are directly related to the project. Then as other development occurs, the City collects an impact fee that is paid to the original developer or successor property owners. This is the system that is addressed in Local Coastal Plan policy XV-7(3).

The FIPAAL proposal is similar to the FIP-GRL, except that instead of waiting for future building permits from which to be reimbursed, the developer and the City enter into an agreement to fund all or a major portion of the improvements in exchange for the developer being reimbursed from sales or other tax receipts generated by the developer's project.

Table 5
Allocation of traffic for impact fees

Parcel	Ocean Vw-Hwy 1 % Fee	Highways 1 and 20 % Fee	Boatyard-Hwy 20 % Fee	S. Harbor-Hwy 20 % Fee
010	1.20%	1.62%	0.85%	0.79%
050	4.31%	4.68%	3.39%	3.17%
060	6.94%	5.40%	3.67%	3.44%
070	2.39%	1.44%	0.56%	0.53%
080	5.02%	3.96%	2.82%	2.65%
090	19.14%	22.30%	12.15%	11.38%
100	7.89%	4.14%	6.50%	6.35%
110	9.81%	16.91%	6.21%	5.82%
120	2.15%	2.52%	1.69%	1.59%
130	11.00%	5.04%	4.24%	3.97%
140	0.72%	0.18%	0.56%	0.26%
150	0.24%	0.18%	0.56%	0.26%
160	4.78%	1.44%	1.13%	1.06%
170	0.96%	0.18%	0.85%	0.26%
180	4.55%	0.72%	3.11%	1.32%
190	3.11%	6.12%	12.43%	2.65%
201	3.35%	0.54%	2.26%	0.79%
210	0.48%	0.90%	0.85%	0.26%
220	0.24%	1.26%	0.00%	0.26%
230	1.20%	1.62%	1.98%	0.53%
240	1.44%	2.16%	2.54%	0.53%
250	*No fee*	*No fee*	*No fee*	*No fee*
260	9.09%	16.73%	31.64%	52.12%
270	*No fee*	*No fee*	*No fee*	*No fee*

Explanation E: Special considerations when calculating traffic generation

There are two other considerations in the traffic allocation. First is that when dealing with traffic for a regional commercial area, such as the Boatyard/Todd Point area, vehicle occupants include both local people who are making a quick shopping trip ("let's run down to Harvest Market and pick up something for dinner" or "Will you stop in at Thrifty's on your way home and get some Band-Aids?") as well as those who travel a great distance to shop in the area at more than just one store. The traffic allocation provides the adjustment for "driveway counts." This means that the data shown reflect the reduction for pass-by trips.

When calculating the average daily traffic or peak hour driveway counts, the traffic budget shown on Table 6 must be adjusted by dividing the traffic budget by 0.60 to convert the budget to average daily traffic.

10. The traffic budget guidelines

The available and reserve bridge capacity has been proportionally allocated to each parcel as its traffic budget. If all parcels develop within the budget allocated, the intersections within the Plan area will not drop below a peak hour Level of Service "D" (V/C 0.90 or less). The LOS D is established when the City Council adopts this Traffic Plan. The Plan's major assumption is that the Level of Service D or better will be achieved at the internal intersections within the Plan area.

The distribution of traffic is designed so that each parcel has a proportional share of the remaining reserve traffic volume for peak hours. A proposed project may use up to that volume of traffic, and even has a certain level of flexibility to go over the limit. This allows consideration of factors, such as a business that has a typical individual peak traffic hour that is different from the average peak traffic hour of the Plan area in general. Table 7 on page 30 provides a system for a step-by-step analysis of traffic impacts.

The final consideration is the factor of peak hour traffic volume. Peak hours vary by individual types of projects. While the intersections in general (from total traffic) experience peak hour traffic effects in the late afternoon, a restaurant, for example, might have a peak hour after 6:00 p.m., which is later than the general traffic peak hour. This means that specific projects might not contribute significantly to the traffic within the Plan Area intersections during the general peak hour. Traffic studies submitted for projects need to explore the time of day that peak hour is anticipated for as a means of providing mitigation. In effect, this approach is similar to the staggered hours for commuter-oriented businesses that is being used in the Bay area as traffic mitigation.

11. Using the traffic budget

With the exception of the parcels identified in Figure L on page 27 for which a broad concept of proposed development was known at the time of publication, each parcel is based on a mathematical calculation that takes the parcel size, allows area for parking, landscaping, and setbacks, and then determines the size of a building footprint. No allowance was made for multiple story buildings (except for motels). It is of critical importance that a developer provide average daily traffic and peak hour traffic estimates based on specific proposed projects. There are several parcels for

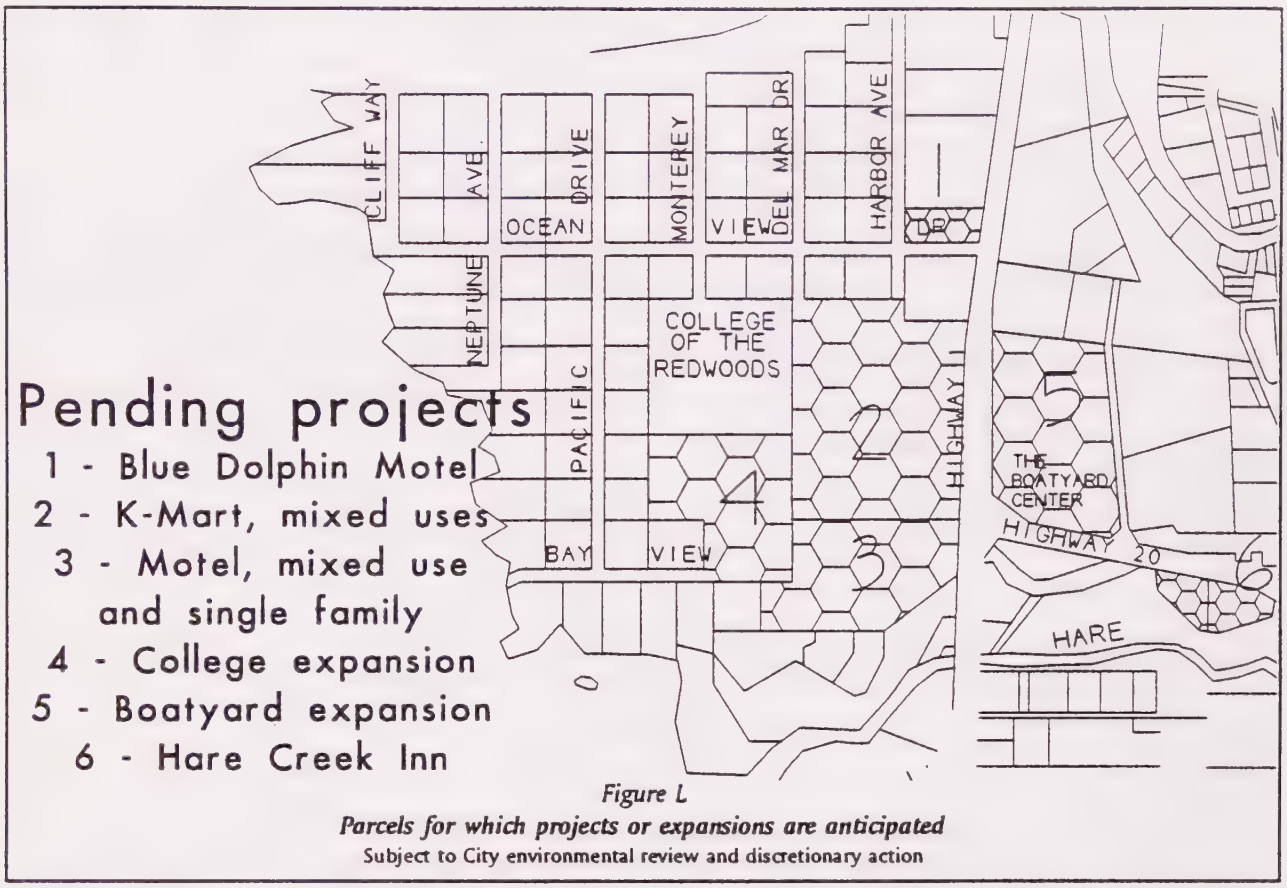

Figure L
Parcels for which projects or expansions are anticipated
Subject to City environmental review and discretionary action

which the City has either received a formal application or for which serious discussions prior to submitting a formal application have occurred. These parcels are shown in Figure L as:

(1) Blue Dolphin Motel (Parcel 7 in Figure C) with a proposed 76 rooms;
(2) the proposed K-Mart development, with over 100,000 square feet of retail stores and restaurants (Parcel 9);
(3) a proposed new 100 room motel, convenience store with gas pumps, restaurant, and 14 single family residences south of the Del Mar Drive extension to Highway 20 (Parcel 11);
(4) the increase in full time equivalent students at the College of the Redwoods to 3,600 from 300 (Parcel 10);
(5) the expansion of new stores by nearly 27,000 square feet at the Boatyard Center (Parcel 19); and
(6) the Hare Creek Inn with a total of 53 rooms distributed across map parcels 23 and 24.[8]

[8]A letter was received from a representative of the Hare Creek Inn indicating their preference was to be considered for over 90 rooms. The original traffic studies and information available to the City indicated that 53 rooms was to be the room count. However, as with any parcel — the precise development applications can include a traffic study. It may be feasible to accommodate more motel rooms in the area, because motels are traffic producers, not attractors. Traffic impacts are generally focussed on the attractions.

Table 6: Assigned traffic budget

Refer to Figure C on page 6.
The parcel numbers shown here match the numbers in Figure C.
To match the numbers with other tables, add a "0" at the end.
To obtain the "driveway count" to match the ITE Trip Generation Manual, divide the average daily traffic shown on this table by a factor 0.60 used for the parcel traffic volume reduction in the Plan.

Parcel	*EXISTING TRAFFIC*		*TRAFFIC BUDGET*		*Parcel*	*EXISTING TRAFFIC*		*TRAFFIC BUDGET*	
	Prod	*Attr*	*Prod*	*Attr*		*Prod*	*Attr*	*Prod*	*Attr*
10			192		150			40	
20	212				160	464		396	
30		386			170			105	
40		560			180			554	
50				664	190		6900		729
60				968	201	144		395	
70			387		210			125	
80				675	220	219			39
90				3319	230			198	
100		1860		2304	240			258	
110			994	726	250	334		315	
120		470		402	260	400	1820	198	1067
130				1112	270	268		67	
140			79						

None of these projects have received any formal approvals by the City. While legally there are no vested rights[9] for any of these projects, the Traffic Plan attempts to accommodate the proposals as they have been presented to the City at various times over the past few years. In effect, the five projects (covering six map parcels) consume over eighty percent of the available traffic between them.

The fair share allocations are based on data that can be used as a general guideline for the City. One purpose of these allocations are to establish the thresholds above which traffic is considered to be a potentially significant environmental impact.[10] Additionally, the allocations are based on providing the City with a general measure as to how traffic will increase within the Plan Area as different

[9]A *vested right* is a property right that is based on the point in time after which the property owner or developer is considered to have a right to be complete, occupy, and use the project.

[10]However, even if a proposal is within the traffic budget allocation, it could still create other potentially significant environmental issues that would trigger an environmental impact report.

projects are considered. As stated earlier, exceeding an allocation does not mean that the project is automatically denied or required to be scaled to a smaller size. Exceeding the allocation means that traffic is likely to be a significant impact, and more precise information will be needed.

Taking the traffic volume allocated to each parcel, the amount of traffic can be used as a base figure on the formula to determine how much development the parcel can accommodate without adversely impacting traffic at an intersection. This is the parcel's fair share. The zoning density or intensity permitted by the zoning code will need to be revised to allow each parcel to develop to its proportional traffic allocation on the basis of meeting Plan goals.

In developing the implementation program for the Plan, each parcel's credible development potential was estimated and projected. This information is compiled into the display in Table 6. This table uses the credible new traffic volume as the fair share for each parcel within the Plan area. The fair share shown in this table is not a fixed number that restricts development. The fair share traffic volume establishes thresholds that cause certain policy programs to be implemented by the City when it reviews a project.

12. Adjusting the General Plan projections for real projects

To ensure that development plans are not unfairly constrained by applying the guidance of this element to a proposed project, individual Traffic Studies are generally going to be needed to assess the impact of a project on the traffic in the area. In order to avoid requiring traffic studies for small projects, and to ensure that traffic analysis is of adequate detail for major projects, the Plan establishes policies that are designed to create two types of thresholds. The first threshold is based on the credible build-out projected average daily traffic. The second threshold is related to annual average peak hour traffic.

Using ITE standards, when a project application is submitted, the application must show the projected peak hour traffic for each intersection and the average daily traffic. The City will examine the project peak hour traffic against the allocation shown in Table 4 on page 17 and then allocated average daily traffic share shown as Final Traffic Budget in Table 6 on page 28. The following review sequence shows the decision-making steps that will be used in the project review:

The purpose of this decision tree is to provide a system which quantifies the traffic issue. The City has experienced situations in which the traffic effects of a project are subject to differing interpretations and speculation, making it difficult for both the public and a project proponent to determine if there are alternative options related to traffic. This decision tree provides the support to quantify the determination as to whether or not a traffic impact is individually or cumulatively significant. The Final Traffic Budget allocated to each parcel in Table 6 accommodates cumulative traffic impacts between the bridges. It also handles the growth of traffic that is projected by CalTrans and the County's Highway 1 Traffic Study. The Critical Lane Volume (CLV) allocated to each parcel

and each intersection in Table 4 addresses cumulative traffic impacts, even when small projects in the area are proposed.

Table 7: Decision tree for reviewing traffic impacts

1. The City will examine the proposed use and the size of the project.

(a) If the use is the same as identified in Table 1 on page 10 **and** the projected adjusted average daily traffic of the proposed project is equal to or less than the Traffic Budget identified in Table 6 on page 28, then no further traffic studies are required. The adjusted average daily traffic is determined by dividing the Traffic Budget by the factor of 0.60 to obtain the "driveway count." The driveway count is compared to the ITE calculations.

(b) If the use is different than identified in the Table, and is considered less intense in terms of traffic generation, **and** the volume of traffic using the calculation methods in 1(a) is less than or equal to the adjusted average daily traffic, the traffic impact of the project has been assessed and analyzed as a part of this Plan. A less intense land use is one that generates fewer peak hour vehicles per unit according to Institute of Transportation Engineers studies.

If the project meets these criteria, the steps to judging traffic impacts are completed. While other criteria may result in the need for an initial study to determine whether other environmental impacts are potentially significant, the analysis of this study and its associated environmental review have addressed the individual and cumulative traffic impacts of projects that will not exceed the assigned traffic budget.

2. If the City is not clearly able to determine the traffic generation from the proposed project using the criteria in Step 1, the City at its option may perform these calculations — or it may require the proponent to have a traffic engineer perform the calculations — to:

(a) Define the average daily traffic generation using the standard calculations and formulae in the ITE Trip General Manual (most current edition) to determine if the total traffic generated by the project will exceed the Final Traffic Budget assigned to the parcel in Table 6 on page 28. If the result of this calculation is equal to or less than the number in the Table, then the proposed project is considered to be within the traffic budget assigned to the parcel.

(b) If the average daily traffic is greater than the budget assigned in Table 6, then the PM peak hour (4 pm to 6 pm) traffic generation for the project may be calculated for appropriate intersections. If the peak hour CLV summation is equal to or less than the budget for each lane movement shown on Table 4 on page 17, the traffic impact is considered to be within the budget assigned to the parcel. The Traffic Budget needs to be adjusted by the factor of 0.60 to compare the data in the budget with the ITE counts. *Note: If the calculations are submitted using ITE shopping center rate, the reduction for captured trips and pass-by (division of the budget by the factor of 0.60) is* ***not permitted.***

If the project meets these criteria, the steps to judging traffic impacts are completed. While other criteria may result in the need for an initial study to determine whether other environmental impacts are potentially significant, the analysis of this study and its associated environmental review have addressed the individual and cumulative traffic impacts of projects that will not exceed the assigned traffic budget.

4. If the traffic volume using the method in item 3 still exceeds the traffic budget, the applicant shall have a traffic engineer prepare an in depth traffic study, similar in scope to the traffic analysis that would normally be prepared for an environmental impact report. This analysis shall be completed prior to consideration of the application by the City.

- The in depth traffic analysis will need to look at critical lane movements proposed by the project.
- The study will have to count traffic as its exists at the time of the proposal, determine the growth rate, and calculate the pre-project level of service and the projected level of service that would result following approval of the project.
- The study will also need to examine all approved-but-not-developed and undeveloped parcels with assigned traffic budgets to determine the cumulative effect.

This requires the following information from which a decision can be made:

(a) If the traffic study shows conclusively that the proposal will fit into the long-term program and volume of traffic for the area — without affecting the traffic budget for any undeveloped or under-developed parcel, then the proponent may proceed through the permit approval process with the project as proposed.

(b) If the traffic study does not show that the proposal can fit into the overall traffic budget, the proponent may either redefine the proposal to reduce its traffic generation to a level that will fit the area; or

(c) The proponent may acquire additional traffic by purchasing traffic rights. The City will need to enact an ordinance to formally set up this process, but basically, if a property owner that has a budget for peak hour traffic into the same critical lanes as the over-budget proposal, and the property owner wants to sell those traffic rights, this would be a method of mitigation. The property owner selling traffic rights, however is selling some of the development potential for that property and will not be able to develop to the levels permitted by this Plan.

5. If traffic is determined to be a significant environmental effect using the tests in this decision tree, the applicant would be required to prepare an detailed traffic study or, most likely, an environmental impact report to examine the projected impacts and propose methods of mitigation. The detailed traffic study may provide analysis related to double-counted vehicles or actual peak traffic hours which could be reviewed to determine if the traffic impacts are actually significant.

13. Circulation Element goals, policies, and implementing programs

Goal TP-1: Develop a program, with the cooperation and assistance of the County and CalTrans, to ensure that new development within the Todd Point-Boatyard area does not cause traffic within the Plan area to exceed Level of Service D (V/C 0.81-0.90 at intersections) between the bridges on a summer peak hour level of service.

Policy TP-1.1: To ensure that the population density and building intensity do not overburden the road network, the City shall establish a combining zone and use other methods of development management to ensure that the credible development level is maintained for each parcel that can be further developed or subdivided within the Plan area.

Implementation Measure TP-1.1(a): Prior to the conclusion of the short-term planning period[11], the City shall prepare and schedule hearings for the creation of the Traffic Constraint (TX) combining district that will apply to all lands within the incorporated City in the Plan area.

Implementation Measure TP-1.1(b): The TX combining district shall, at a minimum, incorporate the following features:

(a) The allowable population density and building intensity of a parcel shall be based on the amount of traffic that the parcel has been allocated on an average daily basis in Table 6. This development constraint applies no matter what levels of population density or building intensity is permitted by the base zoning district.

(b) A mechanism that allows a proponent to amend the Circulation Element of the General Plan — which includes this traffic plan — to change the traffic budget on a proportional basis for all parcels if it can be shown that the data are not correct and that more traffic may be allocated within the Plan than the volume provided in Table 6.

(c) An ability to purchase excess traffic from other parcels if a project is too large to fit within the traffic budget. The purchase of traffic from other parcels must be from parcels that are projected to attract traffic volume in the same peak hour critical lane movement pattern as the parcel purchasing the traffic volume. This means that a parcel impacting southbound Ocean View and Highway 1 cannot purchase traffic from a parcel that only impacts eastbound Highway 20 and South Harbor Drive, as an example.

(d) The ordinance must also provide that when traffic rights are purchased, the parcel selling the rights shall be designated by both zoning and recordation of a deed restriction that it has surrendered development potential.

Implementation Measure TP-1.1(c): Prior to the conclusion of the short-term planning period, representatives of the City shall meet with County officials to seek County cooperation in the adoption of a TX combining district or similar County district that can be applied to all parcels in the unincorporated area that are included in the plan area.

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[11]The *short-term planning period* covers the period from the date of adoption of the Traffic Plan through its fifth anniversary. The *intermediate-term planning period* covers years five through ten, and the *long-term planning period* applies to actions that must take place more than ten years following adoption.

Implementation Measure TP-1.1(d): This policy shall not be applicable to any existing parcel of land within the City of Fort Bragg or the unincorporated County upon which development is limited by zoning to construction of one new single family residence or continued use of one existing single family residence.

Implementation Measure TP-1.1(e): In the interim period until the TX combining district is enacted, prior to the issuance of any building permit, or as an application requirement for any proposed subdivision, parcel map, conditional use permit, design permit, or other City discretionary project application, the proponent shall cause to be prepared a traffic study meeting the standards established in Traffic Appendix Binder, Traffic Study Standards, which shall assess the potential traffic generated by the proposed project and shall substantiate that the proposal would not exceed the Final Traffic Budget as shown on Table 6 for the subject property for average daily traffic, or the critical lane volumes allocated in Table 4.

Implementation Measure TP-1.1(f): The costs of preparing Traffic Plan shall be collected as a part of any traffic improvement costs for the project area. Each parcel shall pay the a proportional amount of the cost of the traffic plan calculated from the percentage of total traffic shown in the Traffic Budget.

Policy TP-1.2: The City shall apportion the cost of improvements within the Plan area pursuant to the options available within State law.

Implementation Measure TP-1.2(a): The cost of the improvements to each intersection shall be assessed as a percentage of the total cost based on the percentage of projected traffic into the intersection as shown on Table 5.

Implementation Measure TP-1.2(b): The City shall work with the County of Mendocino, CalTrans, or the Mendocino Council of Governments to finalize an engineering plan for the intersection of Highways 1 and 20, and shall work expeditiously with a goal of commencing construction prior to the conclusion of the short-term planning period. The design of the Plan shall conform to any requirements of the City and CalTrans related to road construction.

Implementation Measure TP-1.2(c): The City shall work with CalTrans to determine whether or not the funds allocated for the HSOPP improvements to Highway 1 can be allocated to the overall improvements in the area, provided that none of the funds allocated to Highway 1 are used to cover costs associated with any other roads in the area. Such funds may, if CalTrans approves, be used for improvements to the existing portion of Highway 20 and its intersection of Highway 1. The funds shall not be used to offset costs on the Del Mar Extension of Highways 20 west of the Highway 1 right of way.

Implementation Measure TP-1.2(d): Incorporated by reference into the traffic plan shall be the existing capacity for each of the four intersections identified in the Traffic Binder Appendix. Prior to the design, approval, and scheduling of the Plan area improvements, no building permit shall be issued until the following steps are followed:

(1) The City may consider approval of small projects that will be able to develop within the remaining capacity of the existing intersections.

(2) Prior to the submittal of an application for a building permit or other discretionary permit, the applicant shall have a projection of the average daily traffic prepared to determine if the traffic is within the traffic budget established on Table 6. If the traffic is within the budget, the City shall estimate the peak hour traffic by multiplying the average daily traffic by ten percent (10% or 0.10). The capacity of the intersection shall be reduced by this amount.

(3) The applicant shall be required to pay the parcel's proportional share of the cost of improving the road network. This cost shall be based upon the estimate prepared by the City as a part of the implementation program for the Traffic Plan. The applicant shall also be required to sign a statement agreeing to receive a refund of excess monies paid or to pay the difference of any funds when the actual project cost is determined.

(4) Once the capacity of the intersection is reached, no building permits shall be issued — with the exception of one single family home to be built on an existing undeveloped parcel that is zoned to permit one single family residence — until such time as the improvements to the intersections affected by the proposed development have been designed and approved by the appropriate agencies; and the construction has been scheduled

Implementation Measure TP-1.2(e): The benefit assessment shall not be applied to any existing parcel for which the zoning district limits development to one single family residence. New parcels created by subdivision or parcel map are subject to participation in the assessment.

Implementation Measure TP-1.2(f): Each parcel's proportional share shall be based on the percentage identified in Table 5 as specified for each of the three intersections for which fees are to be collected. This table shall be the rational nexus for impact fee allocations.

Implementation Measure TP-1.2(g): The cost of constructing the Del Mar Drive extension from Ocean View Drive to the Intersection of Highways 1 and 20 shall be the responsibility of project development on parcels 9 and 11.

Implementation Measure TP-1.2(h): Pullouts and shoulders shall be included in the design in order to provide room for vehicles to pull-over for emergency vehicles.

Policy TP-1.3: The City shall work with the Mendocino Council of Governments and CalTrans to obtain financial assistance for the costs of design and improvements needed to serve increases in regional (external) traffic as called for in Local Coastal Plan Policy XV-6 (Refer to page 3, on which LCP Policy XV-6 is written).

Implementation Measure TP-1.3(a): Prior to the development of the M-COG requests for the Regional Transportation Plan, City and County representatives shall present the plans, costs, and proposed methods of financing the Plan area improvements. Any funds contributed by M-COG shall be deemed a County contribution.

Implementation Measure TP-1.3(b): The City shall work with CalTrans to determine if the HSOPP funds for Highway 1 in this area can be used to offset costs associated with Highway 1 improvements needed to implement the Traffic Plan.

Goal TP-2: Allow for the transfer of critical lane volume entitlements from one parcel to another within the same critical lane area.

Policy TP-2.1: The sale or transfer of traffic rights shall be the equivalent of a property-owner initiated reduction in development potential.

Implementation Measure TP-2.1(a): During the short-term planning period, the City shall enact an ordinance to accommodate the transfer of traffic rights.

Implementation Measure TP-2.1(b): The ordinance shall be coordinated with the Traffic Constraint (TX) combining district regulations. It shall include at a minimum:

(a) A requirement that when traffic rights are sold, a notice that development potential has been reduced shall be recorded as a covenant upon the parcel of land and recorded with the County Recorder. The City shall be a party to the future release of the covenant. The ordinance shall specify the language and form of the covenant.

(b) Consideration of a change in zoning district to a less intensive zoning district, if consistent with the General Plan.

(c) A method of identifying on the City's official zoning map those parcels for which a transfer of traffic rights has occurred.

Implementation Measure TP-2.1(c): When a parcel is proposed for subdivision, the property owner shall assign the allocation of traffic from the parcel's budget to each of the new parcels. The method of apportionment shall be the property owner's decision, but in no case shall the apportioned traffic to the new parcels exceed the traffic budget for the parcel prior to subdivision as assigned in Table 6.

Implementation Measure TP-2.1(d): Prior to submittal of the parcel or final map, the City shall require that a note be placed on the parcel or final map and the City's official zoning map indicating the division of traffic budget between parcels.

Goal TP-3: Provide for development flexibility in considering traffic impacts.

Policy TP-3.1: Use the criteria of this element to allow consideration of methods of mitigating peak hour and critical lane traffic impacts.

Implementation Measure TP-3.1(a): Allow the use of accepted engineering standards related to traffic study and analysis to consider mitigation to peak hour and critical lane movement impacts.

Implementation Measure TP-3.1(b): In conformance with the Decision Tree in Table 7, allow for creative mitigation, if it can be substantiated that the concepts or programs will reduce or avoid traffic impacts.

Implementation Measure TP-3.1(c): Nothing is this Plan shall understate or override the legal requirements of environmental review as mandated by the California Environmental Quality Act.

Policy TP-3.2: Bay View Avenue shall not become a through street.

Implementation Measure TP-3.2(a): The City shall not give its approval to any design plan that shows a connection from the Highway 1 and 20 intersection or extension of Del Mar Drive to Bay View Avenue.

Implementation Measure TP-3.2(b): In no event shall there be any design, construction, or proposal to allow traffic to enter onto Bay View Avenue from either the extension of Del Mar Drive, or any road or driveway extending the alignment of Highway 20 west of Highway 1.

2. Max Hill (3 letters, March 20, 27, 1992 and May 23, 1992)

May 23, 1992 letter:

Issue 1: The flow from one lane bridges to two lanes of traffic back to a one lane bridge. The traffic engineers working on this project have used the bridges and bridge capacity as a control. What this means is that during the peak hour, the engineers have determined that a fixed number of vehicles can enter the area between the bridges.

a. The controlling factor for this is the Noyo River bridge which can allow 1,600 vehicles to enter the Plan area (southbound lane one-hour traffic volume. The bridge also allows 1,600 vehicles to exit the Plan area, resulting in a total movement over the Noyo River bridge of 3,200 vehicles (including trucks and recreation vehicles).

b. Some of that traffic may be going to the college for a class. This vehicle would then travel southbound across the bridge, make a right turn on Ocean View Drive, enter the collect, and return the same way. That car, though it represents two of the 3,200 trips, does not add traffic to the Highway 1 and 20 intersection.

c. Similarly, a vehicle coming northbound across the Hare Creek bridge may be going to the Boatyard. It would make a right turn on Highway 20 and a left turn on Boatyard Drive. While this adds two vehicle trips into the Plan area, it does not add any traffic to the Noyo River Bridge.

d. What the traffic engineers prepared was based on a number of observations and field data collected during peak travel periods. It appears that about half the traffic in the Plan area moves to the south and half to the north (actual percent was 51% northbound/49% southbound. Traffic was also examined to calculate how many vehicles were actually passing through between the two bridges, in other words, through traffic that would not stop.

e. Using the capacity of the Noyo River Bridge as control — 1,600 vehicles in and 1,600 vehicles out (this figure is based on actual field counts, not a mathematical office calculation as used in generating the lower capacities for the bridge) and using the traffic patterns and the types and intensities of land use — the traffic engineers projected the amount of traffic that would come into the Plan area and return by the same route, the traffic that would combine shopping trips with several businesses in the Plan area, and the traffic that would pass through without stopping. This figure is the traffic that must be moved between all of the intersections.

f. The design concepts for the two key intersections are intended to add multiple lanes to handle differing types of traffic. Right now, there is one lane of traffic in each direction that must handle through traffic, slow traffic, fast traffic, and turning traffic. The proposal will provide one lane is each direction for through traffic; one lane in each direction that will be used for traffic slowing to make right turns in combination with slow traffic; and one lane in each direction that will hold the lines of cars need to make left turns. In effect, three lanes of traffic will replace the role being handled by one lane of traffic.

g. The reason that the Plan area has traffic jamming up at present is that the road segment between the bridges is not capable of handling the volume of traffic that the bridges can move into

Furthermore the use of Harbor would lessen residential resistance; not a small consideration.

I also want to let you know that we appreciate your reiterating that no traffic will flow from the development through Bay View. This issue would come under the heading of being "Non-Negotiable".

As I understand it all of the traffic or road construction would be completed before the Commercial development would take place. If this is so, it would help if such a statement was included in the final Draft. If this is not the case I would like to be enlightened as to how it will work.

I wonder if it might be helpful as a cautionary statement that the cost of bringing in City Water to the residential area of Todd Pt.,should eventual Hydrological Studies determine the necessity of, be included in the total Funding Improvements that will be included in the final Draft. A study was undertaken a few years ago and a cost of $400,000 was arrived at. Gary Milliman has the details. I have a copy of a letter discussing this.

Please let me know if I can be of further assistance; it is much better to clear up these points now than at the final hearing.

One last thing, I presume that you are going to attempt to resolve the differences between your report and the Caltrans letter of April 13, otherwise I don't see how this plan can go forward. If you need help on the Caltrans issue of connecting Hy 20 intersection with Bay View (the defeat of) please let us know and we will bring people to any hearing where-ever it is to convince Caltrans as to the damage that a proposal like this can do.

Best Regards

Max Hill
707-964-9129

23 May, 1992
31401 Bay View Ave.,
Fort Bragg, Ca., 95437

Eric Jay Toll AICP, Inc.,
1050 East William, Suite 407
Carson City Nevada 89703

Dear Eric:

I would like to commend you and Barnard for for your forthright and honest review of the issues last Wednesday evening in City Hall chambers. Although we did not mention it,those of us who were present from Todd's Point appreciate your detailing in the Draft several of the environmental issues that will affect us. The most important being water. Hopefully,your stressing of these concerns will permeate into the analyses of the EIR that will be done by the Brady & Associates people.

I would like to sum up some key considerations that came out of last Wednesday's review:

Assuming that indeed two more lanes are added to Hy 1, that means that the possibility exists of four (4) lanes of traffic (two from the North and two From the South) entering into one lane at the Ocean View intersection as it presently exists; clearly an unworkable situation. I think Ron Spath was referring to this last Wednesday. Now I think you took issue with him on this but I don't see why. You may have mentioned something about a further redesign of the intersection; I may have missed it. I would appreciate being cleared up on this.

I can't stress too much on the importance of your recommending the use of Harbor Drive instead of Del Mar. In my letter to Scott Cochran dtd 27 March '92 and Ed LeLievre's letter dtd 30 March '92 which I believe were passed on to you we detailed several advantages resulting from this substition. Incidentally if you do not have these comments, please call me and I will forward you copies immediately. As to the objection that using Harbor might go through someone's lot, well that could be handled through a condemnation or eminent domain procedure, the cost of which is added to the development. As Mayor Huber put it, everybody will have to give a little or words to that effect. In any case there is no building on the site so the harm is minimal. Further, a cleverly designed Harbor extension might might make the impact to the property owner so minimal that the lot would still be buildable.

I spoke to Bill Lex the College Dean right after the review and he assured me that as far as the college was concerned, the use of Harbor Dr. was preferential. He also stated that he had written to you about this preference.

March 27, 1992
31401 Bay View Ave.,
Fort Bragg, Ca., 95437

Scott Cochran
City Planner
City Hall, Fort Bragg,
Ca., 95437

Subject: Comments relative to "Boatyard & Todd Point Traffic Plan" Revised Draft dtd March 9, 1992

Dear Mr. Cochran:

A review of the subject plan reveals a significant omission; namely, study data and engineering analysis on the alternate intersection of Harbor Ave. instead of Del Mar with Ocean View Ave. for the commercial traffic into and out of the proposed development.

The use of Harbor Ave. in lieu of Del Mar offers several advantages:

1. Harbor Ave. lies approximately 420 feet East of Del Mar which results in commercial traffic intruding that much less into the residential area.

2. Harbor Ave. blends in perfectly with the new intersection at Ocean View and Hy 1. Commercial traffic entering and exi the commercial development would flow smoothly through the intersection without the necessity of additional turning. The use of Del Mar by the commercial traffic would force the use of Ocean View for an additional 400 feet.

3. Using Del Mar would would result in commercial traffic competing with the College traffic since Del Mar flows intp the College parking lot. This has the potential of creating a hazard especially when the college is expanded. The use of Harbor Ave. would avoid this problem.

The traffic plan does not discuss the use of a frontage road placed just to the West and paralleling Hy 1. This frontage road could connect to Harbor Ave. and handle the commercial traffic with much less disturbance to the residential community. I claim that this omission is also very significant and this aspect should be studied and evaluated.

It is obvious that the latest draft only considers the traffic resulting from the zoning as it presently exists. I believe it is the intent of the developer to petition for rezoning from Visitor Commercial to Community Commercial resulting in a more dense complex as well as heavier traffic. If the heavier usage resulting from the proposed rezoning has not been factored in to the latest draft then I submit that the plan is incomplete.

Tier II
Final Environmental Impact Report
Boatyard/Todd Point Traffic Plan

1 Introduction

The City of Fort Bragg (lead agency[a] and applicant) is considering an amendment to its General Plan to add a Traffic Plan for the Boatyard-Todd Point area to the newly revised Circulation Element.[b] The City has authorized preparation of a tiered environmental impact report in order to provide a foundation for the understanding of the environmental consequences of its decision and to consider potential alternatives to its action. The City is acting as lead agency, as it is the governmental jurisdiction to make a decision concerning approval of the proposed General Plan amendment. This is the Tier II Environmental Impact Report, which is intended to supplement the Tier I EIR for the Circulation Element that is scheduled for certification on October 28, 1991.

1.1 Environmental Impact Reports

1.1.1 California environmental regulations

The State of California has a law in effect called the *California Environmental Quality Act,*[c] more commonly called by its acronym, *CEQA* (pronounced SEE-kwa). The law, nested in the Public Resources Code, requires that every governmental entity considering a project must make an informed decision based on the environmental consequences of its action.

The decision must also consider alternatives to the project which could avoid or reduce the impacts if a project might have potential significant environmental effects. CEQA requires an analysis of environmental effects and recommendations of potential methods of reducing or eliminating the impacts. This information analyzing potential effects, mitigation measures, and alternatives is incorporated into a document called an *environmental impact report.* CEQA also provides that the Governor's Office of Planning and Research (OPR) must establish guidelines for the law's implementation. OPR last published guidelines in 1986. The law and its interpretation have changed over the years. The current regulations are contained in the California Code of Regulations, which is published by Barclay's Legal Publishing in South San Francisco.

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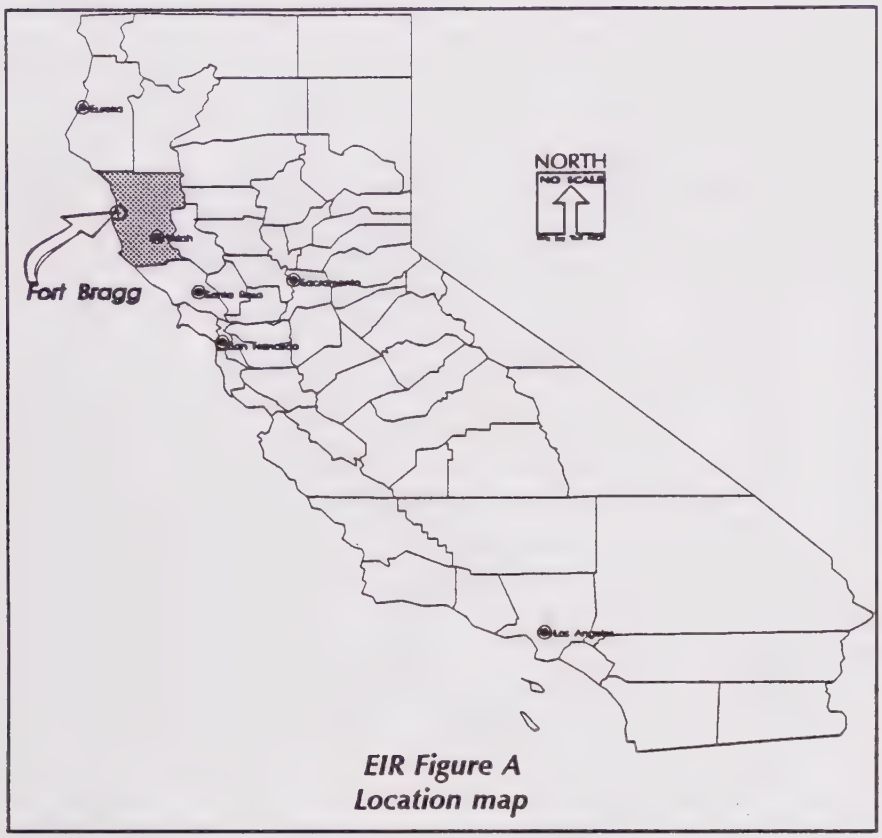
[a] *A lead agency* is the public agency with principal responsibility for carrying out the project (14 CCR §15367).

[b] *The adoption of the revised Circulation Element is scheduled for October 28, 1991, during the review period. The City Council has held its final hearings and has directed that the Element be prepared for adoption.*

[c] *State of California, Public Resources Code §21000 et. seq.*



EIR Figure A
Location map

1.1.2 Organization of the Environmental Impact Report

The Environmental Impact Report (EIR) is organized in a manner which provides the greatest ease of use for decision makers and interested persons. The State CEQA Guidelines, providing format and content requirements,[d] state that "[e]nvironmental impact reports shall contain the information outlined in [Article 9 of the CEQA Guidelines], but the format of the document may be varied."[e] The Governor's Office of Planning and Research interprets this to mean that an EIR "...may be prepared in a wide variety of formats, so long as the essential elements of information are included."[f]

The Tier II EIR is intended to supplement the information contained in the Tier I Environmental Impact Report as this data reflects greater available detail associated with the Traffic Plan. While the Traffic Plan has been the subject of separate preparation and adoption, it is an integrated component of the Circulation Element and does not stand by itself.

The Tier II EIR is organized to highlight *only that environmental information that represent different environmental impacts* that the Tier I EIR. The Tier II Final EIR addresses those issues and comments that were raised during the public review period that incorporated issues relevant to the Tier's environmental review.

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[d] *14 CCR §§15120-15142.*

[e] *Office of Planning and Research, CEQA: California Environmental Quality Act, Law and Guidelines (North Highlands: State of California, June, 1986), annotations page 132.*

[f] *Ibid.*

1.2 Administration of the Environmental Impact Report

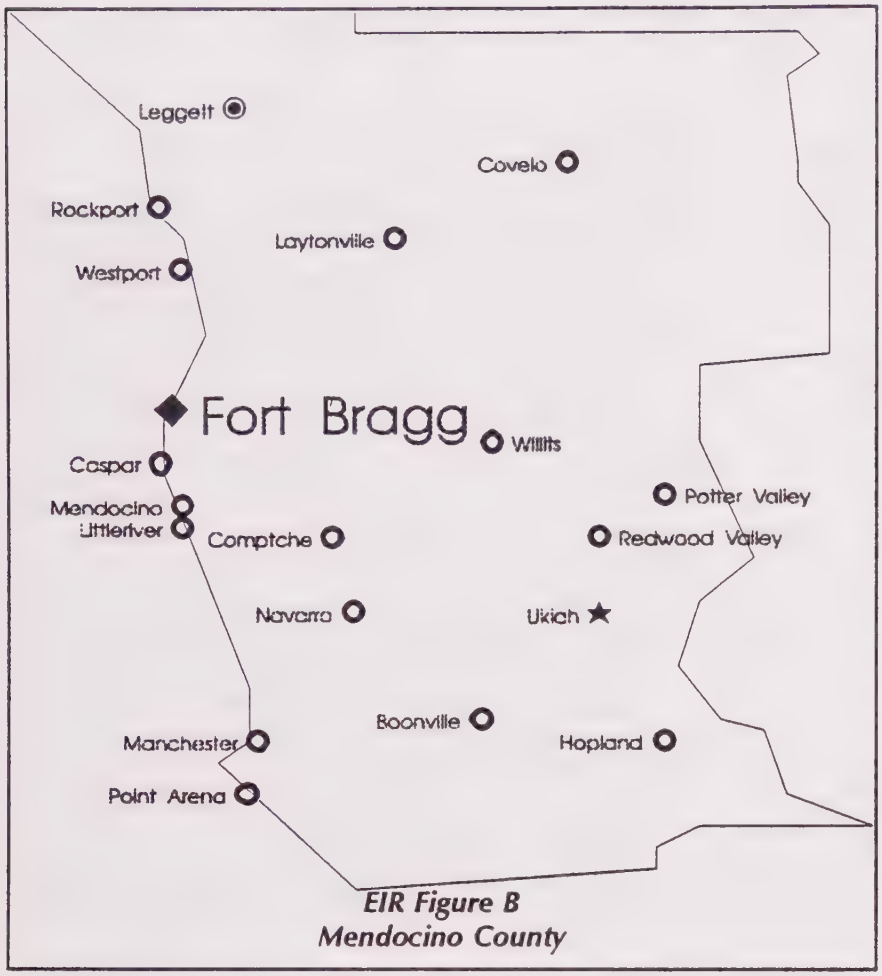
Project:	City of Fort Bragg Circulation Element Revision
Project for which this document is prepared:	Boatyard/Todd Point Traffic Plan (mandated by the Local Coastal Plan)
Lead agency actions required:	Action by the City Council to amend the Fort Bragg General Plan with the adoption of the Traffic Plan as part of the Circulation Element.
Responsible agencies:[8]	California Department of Transportation (CalTrans): cooperation needed for implementing the goals related to the State Transportation Improvement Program (STIP) and State Highways. Mendocino Council of Governments (MCOG): Approval required to implementing programs requiring COG funds. California Coastal Commission: Review of the Plan for conformance with the Local Coastal Plan. Mendocino County Board of Supervisors: Approval of a memorandum of understanding or joint powers agreement to implement portions of the Traffic Plan in the unincorporated area.
Report supervision:	Scott Cochran, Planning Assistant, City of Fort Bragg, 416 North Franklin Street, Fort Bragg, California 95437, (707) 961-2825
Consultant for preparation of the EIR:	Eric Jay Toll AICP. 1050 East William, Suite 407 · Carson City, Nevada 89701 · 702 · 883 · 8987

1.3 Purpose

The purpose of the tiered environmental impact report (EIR) is twofold. First, it is intended to examine the proposed circulation element and alternatives in order to supply the data required for an informed decision by the Council. Second, the Tier I EIR is intended to provide a foundation from which future project-specific environmental impact reports can be prepared. Early in the implementation of the California Environmental Quality Act, a document called a *Focused EIR* was permitted when it appeared that environmental issues were centered around one or two topics. Legal decisions and a refinement of the EIR process resulted in the elimination of the Focused EIR as a viable option in the early 1980s.

The Tiered EIR replaced that concept with a different approach. When a city is considering a policy document, it is not only impractical, but highly speculative to require that an EIR address all potential environmental impacts and provide mitigation measures. First, a General Plan or its amendments cannot be modified by conditions. This means there is no viable means by

[8] ***A responsible agency*** **is a public agency which will issue a permit for a project over which the lead agency has primary responsibility (14 CCR §15381).**



EIR Figure B
Mendocino County

which a mitigation measure can be imposed in a General Plan.[h] The tiered EIR provides a focus by identifying that there are potential impacts in an area for which a policy may permit future development. By making this identification, the property owner then knows in advance that the application for development must specifically address the issue identified in the lower tier of the EIR .

Using the Tiered EIR as a foundation for assessing future development means that the specific project is submitted with a far greater understanding of its environmental consequences that if there were no base from which a future EIR could be prepared.

1.4 The EIR process

Environmental impact reports are prepared in two steps to accommodate the greatest amount of public participation. The first step, is the draft environmental impact report, commonly called the *DEIR*. The Draft EIR is prepared by assimilating available information, generating new data as required, and presenting the findings and conclusions in a format conforming to State regulations and the City 's EIR process. When completed, the DEIR is circulated to the public and various responsible and trustee agencies for purposes of obtaining formal comments about its content. A review period of forty-five days is established for this process.

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[h] ***Policy documents, unlike a specific project proposal, are "paper products." Building permits are not issued, subdivisions are not given tentative approval, nor are future entitlements delivered as a result of approval of the Plan or its amendments. What occurs is that the Plan opens the door to such projects. Environmental analysis of the General Plan and proposed changes needs to focus on what the open doors mean to the community.***

This is a subtle, but distinct difference, between a project-specific EIR in which a physical activity will take place on a specific parcel of land. In the former, areas in which special development consideration are needed can be identified, but specific mitigation cannot be proposed because it is not known how the parcel will be developed. In the latter, a proposal is on the table for certain physical development, so that the exact impacts of the project can be examined.

During the review period, a public hearing will be conducted in order to take statements from interested parties.

When the review period concludes, the City reviews each comment that was submitted and prepares a response to the issues. The responses are consolidated into a document called the final environmental impact report or FEIR. The Final EIR may address each comment by summarizing the issue and response in a separate section, the document may be modified to respond to the comment, or it may provide notations in the text. When the FEIR is completed, the City Council will consider whether to certify the document as complete. Once it is certified the document becomes the Environmental Impact Report.

Certification of the EIR does not mean that the document is the final authority. Certification is a formal action by the City Council stating that the EIR was prepared in conformance with the California Environmental Quality Act and that the Council considered the EIR prior to making its decision. A major purpose of an EIR is to inform. The Council may disagree with some conclusions in the EIR, but still certify the document. Technical disagreement of differences of opinion do not undermine the legal defensibility of the EIR.

2 Scope of issues

2.1 Direct vs. indirect impacts

The California Environmental Quality Act requires that an environmental impact report review a list of environmental issues to determine if approval of a proposed project will result in the potential of a *significant effect.* To assist the development of environmental review program, the State's codified regulations include appendices to provide a measurement of which effects are significant or not significant.[i] In addition to examining the direct impacts potentially created by a proposed project, the EIR is required to examine *indirect environmental effects.* Indirect impacts are those which are not created by the project's approval, but may eventually occur when other projects that are enabled by the project (the Circulation Element) are developed. This assessment of indirect issues is the focus or main scope of the Tier I EIR. The support for this approach comes from the CEQA Guidelines:

§15385 Tiering. "Tiering" refers to the coverage of general matters in broader EIRs (such as on general plans or policy statements) with subsequent narrower EIRs or ultimately site-specific EIRs incorporating by reference the general discussions and concentrating solely on the issues specific to the EIR subsequently prepared. Tiering is appropriate when the sequence of EIRs is:

(a) From a general plan, policy, or program EIR to a program, plan, or policy EIR of lesser scope or to a site-specific EIR.

[i] *14 CCR Appendix G.*

(b) From an EIR on a specific action at an early stage to a subsequent EIR or a supplement to an EIR at a later stage. Tiering in such cases is appropriate when it helps the lead agency to focus on the issues which are for decision and exclude from consideration issues already decided or not yet ripe.

In using the tiering concept, the EIR will separate those issues which are direct, and need to be examined in substance at this Tier in the EIR process from those effects that are indirect, and are better reviewed in a later tier. The Guidelines define effects as:

§15358 Effects. "Effects" and "impacts" as used in ... (the) Guidelines are synonymous.

(a) Effects include:
(1) Direct or primary effects which are caused at the same time and place.
(2) Indirect or secondary effects which are caused by the project and are later in time or farther removed in distance, hut are still reasonably foreseeable. Indirect or secondary effects may include growth-inducing effects and other effects related to induced changes in the pattern of land use, population density, or growth rate and related effects on air and water and other natural systems, including ecosystems.

(b) Effects analyzed under CEQA must be related to a physical change.

2.2 Potentially significant environmental effects

One area of confusion associated with the California Environmental Quality Act is the determination of which environmental impacts are considered to be significant, and which impacts are not. The CEQA Guidelines include a general yardstick from which significant impacts can be measured. The measures, which are included as Appendix G in the Guidelines were used to define the scope of potentially significant impacts generated by the Circulation Element.

A project will normally have a significant effect on the environment if it will:
(a) Conflict with adopted environmental plans and goals of the community where it is located;
(b) Have a substantial, demonstrable negative aesthetic effect;
(c) Substantially affect a rare or endangered species of animal or plant or the habitat of the species;
(d) Interfere substantially with the movement of any resident or migratory fish or wildlife species;
(e) Breach published national, state, or local standards relating to solid waste or litter control;
(f) Substantially degrade water quality;
(g) Contaminate a public water supply;
(h) Substantially degrade or deplete ground water resources;
(i) Interfere substantially with ground water recharge;
(j) Disrupt or adversely affect a prehistoric or historic archaeological site or a property of historic or cultural significance to a community or ethnic or social group; or a paleontological site except as a part of a scientific study;
(k) Induce substantial growth or concentration of population;
(l) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system;
(m) Displace a large number of people;
(n) Encourage activities which result in the use of large amounts of fuel, water, or energy;
(o) Use fuel, water, or energy in a wasteful manner;
(p) Increase substantially the ambient noise levels for adjoining areas;

(q) Cause substantial flooding, erosion or siltation;
(r) Expose people or structures to major geologic hazards;
(s) Extend a sewer trunk line with capacity to serve new development;
(t) Substantially diminish habitat for fish, wildlife or plants;
(u) Disrupt or divide the physical arrangement of an established community;
(v) Create a potential public health hazard or involve the use, production or disposal of materials which pose a hazard to people or animal or plant populations in the area affected;
(w) Conflict with established recreational, educational, religious or scientific uses of the area;
(x) Violate any ambient air quality standard, contribute substantially to an existing or projected air quality violation, or expose sensitive receptors to substantial pollutant concentrations;
(y) Convert prime agricultural land to non-agricultural use or impair the agricultural productivity of prime agricultural land;
(z) Interfere with emergency response plans or emergency evacuation plans.

In concert with the information presented here, the judgement as to whether an impact is significant is based on whether there is substantial evidence in the record to support a fair argument that a project may have a significant effect on the environment. The conclusions are the issues detailed in EIR Table 1 on page EIR Page 8.

The proposed project is the approval of a revised Traffic Plan that will be a part of the Circulation Element for the Fort Bragg General Plan. The Traffic Plan proposes a number of policies that a intended to guide development and assessment of traffic impacts in the area surrounding the junction of Highways 1 and 20 in south Fort Bragg. The proposed Traffic Plan will be incorporated into the General Plan and will replace Chapter IIIA in the newly adopted Circulation Element.

When the Boatyard/Todd Point Traffic Plan is adopted, the City will need to incorporate the proposed programs into its annual budget. Some of the implementing programs will require the enactment of new ordinances or regulations for development projects. Others will require the calculation of an impact fee to be assessed against new development. These are just a few of the types of actions that will be taken in order to put the Traffic Plan into effect.

2.3 Issues considered significant

EIR Table 1 serves as an analysis of the issues that are believed to have potentially significant direct or indirect environmental impacts as a result of approving the Circulation Element as it is presently written. These are the issues that are addressed in more detail in the environmental impact report.

To aid the decision as to whether or not an environmental impact report is to be prepared, an *initial study* may be developed to specify which issues the lead agency believes have the potential to be significant. In situations where the decision has been made in advance that a project is to have an environmental impact report prepared, the initial study is not necessary. It is presumed that when the project is reviewed for its environmental consequences, the scope of potentially significant effects will become apparent.

With the Traffic Plan, EIR Table 1 serves as an initial study. This is the listing of the issues which are believed to be potentially significant prior to the start of the EIR preparation. During the preparation of the EIR, some of the issues were determined not to have significant effects. These are identified in the EIR and in Chapter 7 beginning on page EIR Page 63.

EIR Table 1: Summary of potentially significant direct and indirect issues

† denotes *Initial Study* issue *number*. ‡ denotes ***Dir****ect* or ***Ind****irect* impact analyzed in the Circulation Element Environmental Impact Report.

★ denotes impact that is generated by the Tier II project.

Impacts with direct or indirect impacts identified, but without the ★ are assessed in the Tier I EIR.

● denotes *This is **likely** to be found to be a potentially significant effect.*

○ denotes *This **may have the potential** to be a significant effect.*

IS#†	*Issue*	*Dir‡*	*Ind‡*	*Explanation*
1a	**Earth:** Compaction, overcovering, or displacements		★ ●	When road construction takes place, grading is required, including cuts and fills.
3b	**Water:** Changes in absorption rates or run-off		★ ○	The new Del Mar Drive extension will allow a major development to take place west of Highway 1; the impervious surface may impact domestic wells in Todd Point
6	**Noise:** New noise level contours need to be projected for the new road routes		★ ○	Showing new roads or changes in traffic patterns may result in increases in ambient noise levels in certain locations.
7	**Light and glare:** New lights may be installed on new roads		★ ○	The issue of street lighting on new roads may have an impact.
13d	**Traffic:** Alterations to present patterns of circulation or movement of people and/or goods	★ ●		The Element proposes a number of changes to traffic flow patterns. This impact, however, may be beneficial rather than adverse. It is potentially significant.
14e	**Public services:** Effect on road maintenance.	★ ●		The Element calls for an increase in the street mileage maintained by the City.

3 Comments received during the public review period

The public and agency comment period closed on March 28, 1992. With the exception of the first two letters, the following letters were received during the comment period:

1. CalTrans (April 13, 1992). Received after the close of the EIR review period. The comments, however addressed issues related to the findings and conclusions in the Traffic Plan. These issues have been addressed and responded to in the revised Plan, as indicated with an asterisk (*) on the letter. Issues that have not been addressed in the Plan were design or technical in nature and will be discussed at the City Council meeting.

2. Max Hill's letter of May 23, 1992. This letter was received after the close of the EIR review period, but stressed a number of issues raised at the May 4, 1992 hearing. Additionally, there are some points supplemented from the verbal testimony and Mr. Hill's original letter. The responses to this letter, including a promised chart of traffic calculations are incorporated with Mr. Hills earlier letters.

In general, comments were divided into two classifications. Many comments were submitted addressed development and design issues related to specific parcels owned by the correspondent. These letters did not raise environmental concerns, but focussed on either the amount of development being allocated to a parcel or the traffic flow and design issues. These letters are from:

1. William Lex, Dean of the College of the Redwoods
2. C. R. Thomason, Thomason Development Company, developer of the K-Mart project
3. Allan B. Carlson, property owner of the lands proposed for the K-Mart project (2 letters)
4. Richard Pool, Associated Transportation Engineers, on behalf of K-Mart.
5. Thomas S. Mitchell, owner of 1031 South Main Street.
6. Richard J. Keaton, owner Keaton Hotels, the proposed Hare Creek Inn.
7. Al Krumvieda, design consultant concerning the Hare Creek Inn.
8. Joseph J. Scherf, Land Surveyor, on behalf of Jack Shaw.

The remaining letters raised concerns that fall under the classification of direct or indirect environmental issues. These letters are from:

1. Edward LeLievre
2. Max Hill (2 letters)
3. Bill Creceliums
4. Ron Geunther on behalf of the Sierra Club
5. Harold R. Platt
6. Margaret Reiter

A letter was also received from the Mendocino County Planning and Building Department. All of the issues in that letter have been incorporated into the Plan.

COPY TO
COUNCIL BOXE
+ SCOTT

COLLEGE OF THE REDWOODS
MENDOCINO COAST
1211 Del Mar Drive
Fort Bragg, California 95437

March 31, 1992

Scott Cochran
City Planner
City Hall
416 North Franklin Street
Fort Bragg, CA 95437

Dear Scott:

This letter is to provide input and to request changes to the traffic plan for the section of Highway 1 between the Hare Creek bridge and the Noyo River bridge.

Three changes to the plan would be appreciated:

1. The proposed extension of Del Mar Drive connecting Ocean View with Highway 20 should be eliminated from the plan. If constructed, this extension would encroach upon the primary campus parking lot.

2. Traffic traveling north on Highway 1 wishing to access the property between the campus and Highway 1 should have the option of turning left and entering the property at the Highway 1-Highway 20 intersection. This option would relieve the pressure of northbound traffic wishing to turn west on Ocean View Drive.

3. Provide access to the northern section of the property between the campus and Highway 1 by developing and using Harbor Drive.

Thank you for considering these recommendations and for including these comments in the plan.

Yours truly,

William Lex

William Lex
Dean

Response to Dr. Lex's letter

Issue 1: The Del Mar extension by the campus will need to be designed to be constructed within the easement already granted to the road by the college. This is a design issue.

Issue 2: The optional left turns for northbound traffic has been returned to the Plan. The final decision on whether a left turn will be permitted at the intersection of Highway 1 and 20 will be left to the engineering design and CalTrans approval process.

Issue 3: The Harbor Drive concept has been analyzed from an engineering and property right of way perspective and it does not provide an adequate alignment between the Ocean View-Highway 1 and Highway 1 and 20 intersections.

THOMASON
DEVELOPMENT
COMPANY

March 30, 1992

Mr. Scott Cochran
City Planner
City of Fort Bragg
416 North Franklin Street
Fort Bragg, California 95437

Re: Draft Boatyard/Todd Point Traffic Plan & Tier II Environmental Impact Report

Dear Scott,

I am in the process of purchasing some property within the Traffic Plan Area (Parcels 9 & 11). It should be noted that this is presently one parcel and the construction of the Del Mar Extension will divide the property. I request that the traffic allocation for this property be considered as one parcel, that is that the traffic allocated to these two parcels should be considered as a total allocation that can be divided in any manner between the two parcels.

As a condition of the purchase, I must be reasonably assured of obtaining the necessary permits for our project. We have retained consultants to review the Traffic Plan on our behalf. Our consultant has informed us that the draft Plan does not contain sufficient data and explanations for them to determine if the plan will work or if it is fair and equitable. Our consultant has requested additional information from Mr. Toll and as of 03/30/92 a.m. had not received it.

I am respectfully requesting that the time for submittal of comments be extended for 15 days after the receipt of the requested additional information by our consultant. One of my major concerns is that there is no date for analyzing the no left turn for Northbound traffic at Del Mar Avenue.

Thank You,

Colburn R. Thomason

cc: Scott Mommer
Kevin Tweed

7100 N. Financial Drive, Suite #103 • Fresno, California 93720
(209) 432-1600 (209) 432-2714 FAX

ALLAN B. CARLSON

P.O. BOX 491 ◻ FORT BRAGG, CA 95437 ◻ 707-964-5211

March 27, 1992

City of Fort Bragg
316 North Franklin Street
Fort Bragg, CA 95437

Attn: Scott Cockran

RE: Draft Boatyard, Todd Point
Traffic Plan

Dear Scott,

My comments concerning the Boatyard, Todd Point Traffic Plan are directed toward Mr. Eric Toll's statement to eliminate left turn lanes for traffic going North at the intersection of Highway One and Highway 20. Mr. Toll's reasoning being that there probably wasn't sufficient space from the intersection South to Hare Creek Bridge to permit a stacking lane.

It doesn't make sense to eliminate a left turn lane or lanes going North in the Traffic Plan. The left turn lanes should remain an option subject to finale accepted engineers plan and the future possibility of a widened Hare Creek Bridge. The elimination of the left turn lanes will have a definite impact on the viability of the purposed commercial development on Todd Point.

Sincerely,

Allan B. Carlson

cc: Eric Toll

ALLAN B. CARLSON

P.O. BOX 491 □ FORT BRAGG, CA 95437 □ 707-964-5211

March 30, 1992

City of Fort Bragg
416 North Franklin Street
Fort Bragg, CA 95437

Attn: Scott Cochran

RE: Draft Boatyard/Todd Point Traffic Plan

I am a property owner within the Traffic Plan Area (Parcels 9 & 11). It should be noted that this is presently one parcel and the construction of the Del Mar Extension will divide the property. I request that the traffic allocation for this property be considered as one parcel, that is that the traffic allocated to these two parcels should be considered as a total allocation that can be divided in any manner between the two parcels.

Secondly, the developer of the property, Thomason Development, to be reasonably assured of being able to obtain the necessary permits for their project. The purchaser has retained consultants to review the Traffic Plan on their behalf. I have been informed that the draft plan does not contain sufficient data and explanations for the consultants to determine that the plan will work or that it is fair and equitable. The consultant has requested additional information from Mr. Toll and as of March 30, 1992 a.m. had not received it.

I am respectfully requesting that the time for submittal of comments be extended for 15 days after the receipt of the requested additional information by the purchaser's consultants.

Sincerely,

Allan B. Carlson

ASSOCIATED TRANSPORTATION ENGINEERS

100 N. Hope Avenue, Suite 4, Santa Barbara, CA 93110 • FAX (805) 682-8509 • (805) 687-4418

Maynard Keith Franklin, P.E.
Robert L. Faris, P.E.
Richard L. Pool, P.E.
Scott A. Schell

March 24, 1992 91056L10.LTR

Mr. Eric Jay Toll, AICP
2401 Michael Drive
Carson City, Nevada 89703

RE: Highway 1 & 20, Todd Point, and Boatyard Area Traffic Specific Plan (March 9, 1992)

We have reviewed the subject draft Traffic Plan. Many of our earlier concerns have been addressed, however, there are still some areas where we have some reservations. In order to properly comment, we need to have a copy of the Appendices. It is our role to advise the owner, developer and one of the tenants of parcels 9 & 11 (this is now one parcel) of the accuracy and sufficiency of the Traffic Plan. Unless we have access to the methods and calculations, this is a difficult statement to make.

Our concerns are in the areas of the HCM calculations, since we know that there are many parameters in the program and verification of those used will assist in the acceptance of the final results; was the assignment of CLV based upon the credible buildout traffic volume or upon the final allocated volume?; It appears that those uses which produce traffic were allowed full development, while the attractors were reduced. Were the produced trips properly accounted so that they did not increase the peak hour traffic volumes used in the calculations (double counting)?; are intersection diagrams drawn to scale available? If not then the conclusions may not be the only one possible, or may not be feasible; what method/formula was used to determine the final adjusted rate?

One reason for requesting a scaled layout of Highway 1/Highway 20 intersection is that it appears that a different lane configuration may be possible. That is, given the southbound lane configuration, there appears to be sufficient width on the northbound leg to provide for a left-turn or possibly dual left-turn lanes. Further, I believe that it is necessary to have a scaled layout for Highway 1 from the Noya Bridge to the Hare Creek Bridge so that and estimate of the cost of the improvements can be made. This cost estimate should either be included in the report or in the Appendix so that the City will have some knowledge of the cost of the program that they are adopting.

The Traffic Plan is quite and undertaking and it will affect Fort Bragg for many years to come, thus it behooves everyone connected with its preparation and adoption to make every effort to have the Traffic Plan as complete and defensible as possible.

Associated Transportation Engineers

By: Richard L. Pool, P.E.
Vice President

RLP/wp

cc: Scott Cochran, City of Fort Bragg
Scott Mommer, Lars Andersen & Associates
Colburn R. Thomason, Thomason Development Company
Kevin Tweed, Pavillion Properties
Paul Wehmeier, Kmart Corporation

2. *C. R. Thomason, Thomason Development Company*
3. *Allan B. Carlson*
4. *Richard Poole, Associated Transportation Engineers*

All of the issues raised by the correspondents have been addressed with the revision of the Plan between the March and July versions.

COPY TO
COUNCIL BOXES

March 30, 1992

Mr. Gary Milliman
City Manager
City of Fort Bragg
416 North Franklin
Fort Bragg, Ca 95437

Regard: Boatyard and Todd Point Traffic Plan, dated March 9, 1992

Dear Gary:

As a commercial property owner in the above refered traffic study, I would like to point out a few inequalities in the report.

The first problem is in regard to the property which is owned by myself at 1031 South Main Street; Fort Bragg, Ca, and is identify as parcel #5, page 9 in the report. If you will refer to page 12, table 1, you will see that parcel #5 shows a maximum build out of 30,000 square feet of new building on 2.10 acres. Please look at parcel #8, same page, it shows a maximum build out of 39,856 square feet on 2.15 acres. That implys that 500th of a acre equals 9856 square feet more than parcel #5.

Example:

39,856 sq ft	39,856 sq ft
X .05	-1,992
1,992	37,864 sq ft

Parcel #5 should then be adjusted to 37,864 square feet.

Next problem:

As the City of Fort Bragg is aware the West side frontage road is not recommend by the traffic report. I find this in conflict with Cal Trans and the City of Fort Bragg thinking.

The frontage road was approved by the City with Cal Trans blessing. The project is in its final stages of complection. Part of the project has been self funded by three property owners: Tom Mitchell, Jack Shaw, and Mario

Affinito. The reason for the funding is that the business serviced by the road cannot wait until 1996 for Cal Trans to decide to do something.

We need assurance from the City of Fort Bragg that the road will not be discontinued.

Sincerely,

Thomas S. Mitchell
AP# 18-440-21

3. Thomas S. Mitchell, owner of 1031 South Main Street.

Issue 1: The calculation for Parcel 5 shows has been revised to show 29,000 square feet for the new building plus 10,000 square feet for the existing building, which totals 39,000± square feet. For the 2.1 acres, this is in line with Parcel 8's 39,856 square feet on 2.15 acres.

Issue 2: The west side frontage road remains in the Plan, but is still not considered a good long-term solution to moving traffic west of Highway 1.

KEATON
HOTELS

March 27, 1992

Council Members
Fort Bragg City Hall
416 Franklin Street
Fort Bragg, CA 95437

Dear Council Members:

The proposed improvements of the Highways 1 and 20 intersection deeply concern me. The omission of left turn lanes for northbound traffic seems to be a mistake. As the managing partner of the proposed Hare Creek Inn, I am concerned about the inconvenience and potential hazard of forcing traffic to make a U-turn at the Ocean View/Boatyard intersection in order to return to Del Mar Drive. More importantly, a very hazardous situation would be created by northbound motorists attempting a prohibited left turn at Del Mar Drive thereby backing up traffic over Hare Creek bridge during peak travel times.

I urge you to include turn lanes in this road improvement project.

Sincerely,

Richard J. Keaton

cc: Gary Milliman

[illegible] FAX

COPY TO
COUNCIL BOXES ✓ MAR 30 REC'D

PEBCO

Al Krumvieda
DESIGN CONSULTANT

A|D
B|D

Professional Building Designer
Member American
Institute Building Designers
Member I.C. B.O.

March 27, 1992

TO: CITY COUNCIL
FORT BRAGG CITY HALL
416 FRANKLIN
FORT BRAGG, CA 95437

SUBJECT: Proposed Hare Creek Motel at intersection of Highways 1 and 20 and Del Mar Dr. extention
Preference: 95 units

FROM: Al Krumvieda
Motel Design Consultant

Dear City Council,

In reference to this project, I have great concerns as to your proposed decision to deny this project a left turn onto Del Mar Drive West.

I have done extensive studies on this project for Mr. Keaton & Mr. Thomason. I have reviewed your study sketch. I am confident your traffic engineer could create a mirror image of your south-bound left turn onto highway 20 with two left turn lanes for 100-120 feet. This would give 10 or 12 cars stacking area. The same as you have on south-bound auto lanes now. This would also be beneficial for the other proposed business' as well. If autos have to travel to the next intersection, north, and make a "U" turn to return, you will create more traffic problems than with a left turn at Highways 1 and 20 and Del Mar West extention.

We are working with a National chain referral system and I am confident that this motel will be an asset to the City of Fort Bragg, but by not allowing left hand turn lanes, could prove to be a grave mistake.

Sincerely,

Al Krumvieda

enclosure
tmd/223.1tr

NEW ADDRESS: PEBCO
20250-B SKYPARK DR.
REDDING, CA 96002

~~2576 HARTNELL BAY 2~~ • REDDING, CA 96002 • (916) 221-1891 • FAX (916) 221-5846

4. ***Richard J. Keaton, owner Keaton Hotels, the proposed Hare Creek Inn.***
5. ***Al Krumvieda, design consultant concerning the Hare Creek Inn.***

The option for left turns on northbound Highway 1 at Highway 20 is added to the Plan.

JOSEPH J. SCHERF
Consulting Land Surveyor and Land Developer

March 27, 1992

Planning Department
City of Fort Bragg
416 N. Franklin St.
Fort Bragg, Ca. 95437

Re: BOATYARD & TODD POINT
TRAFFIC PLAN

Attn: Scott Cochran:

On behalf of my client, Jack Shaw, I am submitting this letter concerning the Traffic Plan. Mr. Shaw owns parcels 010, 020 and 040 in the study area. These are classified Open Space/P-D, HVC and SSF.

The 010 parcel borders on Cliff Way, Neptune Avenue, Pacific Drive, Monterey Avenue, Del Mar Drive and Harbor Avenue. This allows all of Parcel 010 traffic to be directed southerly to Ocean View Drive. Parcel 020 and 040 have access on Harbor Avenue and Highway One..

I've enclosed a copy of a Proposed Developement that was drawn by Edward L. Taubold, Registered Architect for a previous owner of the Shaw property. Mr. Shaw believes that this is a viable developement that could be accomplished and be a valuable asset to the City of Fort Bragg.

The various traffic projections for his property indicate a level of vehicles per day that do not take into account the above Proposed Developement. The ITE Trip Generation tables indicate that there could be anywhere from 500 to 1,000 trips per day (1,000 would be a fully developed - full use of all facilities).

In addition, the existing 44 dwelling units now on Parcel 020 and 040 should have 440 vehicles/day based on 10 trips/day/space.

Mr. Shaw requests that these increased vehicles/day figures be used to better reflect the actual potential traffic from his property.

I would appreciate your notifying Mr. Shaw and myself of the upcoming public meeting dates so that we can plan to be there.

Thank You,

Joseph J. Scherf

6. Joseph J. Scherf, Land Surveyor, on behalf of Jack Shaw.

Mr. Scherf asks for consideration of a development proposal that had never been submitted to the City for its consideration. The proposed development concept generates far too much traffic than could be accommodated in the area without extensive design and environmental study. At the direction of the City Council, the traffic budget was locked on the basis of the May 4, 1992 version of the Traffic Plan. Mr. Scherf has a number of options related to submitting the proposal when an application is ready to be prepared.

MAR 31 1992

E.&B. Le Lievre
31301 Bay View Ave.
Fort Bragg, CA 95437

March 30, 1992

City of Fort Bragg
416 N. Franklin St.
Fort Bragg, CA 95437

Attention: Mayor Matt Huber, City Council Members P. Campbell, J. Cimilino, M. Kendall, A. Schade; G. Milliman, City Admin.; S. Cochran, Planner; L. Henry 4th District Supvr.

References: Letter to City of Fort Bragg, same Attention dated 25 November 1991, Subject Draft Boatyard Todd Point Traffic Plan & Tier II EIR dated October 15, 1991

Subject: Boatyard & Todd Point Traffic Plan, Revised Draft dated March 9, 1992

Dear Officials:

The referenced letter indicated our unqualified opposition to the proposed plan to extend Highway 20 onto Todd Point and connecting to Del Mar Drive. One of the major reasons for opposing this part of the Traffic Plan is the increase in noise level on Todd Point caused by cars, small and large trucks, and other service and emergency vehicles including ambulances, police, and sheriff sirens, etc. A copy of the referenced letter is attached. As indicated by Mr. E. Toll in the revised draft of the EIR on page 10, paragraph 3.4.1 Summary of major findings

"Traffic noise in a community is one of the major sources of ambient noise levels. If noise levels become excessive, the sound can become a nuisance, a health hazard, or both. One part of the General Plan is a Noise Element. The Traffic Plan adoption may directly result in some changes related to noise for residences in the Todd Point area.

If traffic is able to move more smoothly on Highway 1, this can actually result in a decrease in traffic noise. The reason is that traffic noise is highest when vehicles have to slow down, stop, and then resume traveling speed. Vehicles with manual transmissions, and especially commercial trucks, generate more noise when gearing up or down than when they are able to move at a sustained speed."

There is no doubt about the accuracy of the above statement in the latest EIR draft. Since the traffic lights became operational on HWY 1 at Ocean View the traffic has at times backed up to HWY 20 amd farther south.

The traffic has also backed up to the north as far as the Noyo bridge and beyond. I am not a traffic specialist but it is obvious that no matter how many pages of justification are generated the problem will not go away; that problem is the one lane bridges over Noyo harbor and Hare creek!

As indicated in the reference letter ambient noise would further increase if the present embankment west of the HWY 20 intersection is removed to build the extension of Del Mar Drive to HWY 20. As vehicles stop and start, especially large commercial trucks, they gear down, brake, restart and then gear up again at that HWY 1 & 20 intersection. To quote Mr. Toll again: "If noise levels become excessive, the sound can become a nuisance, a health hazard, or both."

Under paragraph 3.4 Noise, on page 11 of the Draft EIR it states: "Methods of reducing the impacts of noise are well documented. The standardized systems can range from simple landscaping to complex systems of sound walls and structural mitigation."

Landscaping if it were high enough and adjacent to the entire length of the planned Del Mar extension, might mitigate the noise problem. But a system of sound walls about 12 feet high and extending south from the college and then east to HWY 1 would be uglier than the Berlin Wall. Obviously one problem maybe solved but a bigger problem is created.

Regarding Section 9 Project Alternatives, EIR page 15, Paragraph 9.2 titled Elimination of the Del Mar Drive extension to Highway 20, the 3rd sentence states: "First it would increase the burden on the Ocean View Drive/Highway 1 intersection, by forcing all southbound traffic from the college of the Redwoods and the Todd Point area into this intersection." WE use this intersection daily and have yet to notice a burden caused by southbound traffic emanating from Todd Point, since installation of the traffic light. The next sentence in this paragraph states "Second it would require northbound traffic from the K Mart proposed development to use the Highway 20 intersection in order to travel north, placing more traffic into the new 4 legged intersection." First the proposed K Mart is not approved nor has the zoning been approved for change allowing this development. Secondly, if the K Mart is developed the north bound traffic will place the traffic into the 4 legged intersection at Ocean View according to Figure L, DRAFT, "Note that no left turn

would be permitted for northbound HWY 1 at Del Mar Extension. Traffic would move to Ocean View to make the left turn." The Plan is confusing and apparently in error and contradictory.

In any event the Ocean View/HWY 1 intersection should be able to handle the north bound traffic emanating from K Mart, if it is developed. If a certified traffic engineer indicates that the Ocean View/HWY 1 intersection can not handle the traffic adequately then K Mart should not be permitted to build on Todd Point!

We are convinced that the plan to extend Del Mar to HWY 20 is not a real/actual solution to this serious traffic problem and would be a costly waste of taxpayor money.

In the referenced letter two alternatives were proposed to mitigate the noise hazard problem and other environmental impact problems. They have not been discussed in the EIR.

The first alternative is to build a frontage road which would extend from Ocean View past the proposed K Mart south to the vicinity of the proposed new residential area.

Alternative 2 was/is to extend Harbor Drive south from Ocean View Drive, connecting to the Proposed K Mart and continuing south to vicinity of the proposed new residential area.

It seems that the serious concerns of the Todd Point community, including the Noise hazard problem, Air Quality, Light & Glare problems are being ignored or postponed. None of these issues, all related to the extension of Del Mar to HWY 20, were actually answered, except to state "specific studies will be needed".

If the traffic plan is approved as proposed it would permit the city to proceed at some future time with the HWY 20/Del Mar extension without further discussion. Any investigations, studies, and associated reports related to the above environmental impacts need to be completed now, distributed and public meetings held to discuss and determine what is best for the community. Until this is done it is requested that the proposed Traffic Plan be disapproved or approved with exceptions related to the above environmental issues.

Very Truly,

Edward Le Lievre

Barbara Le Lievre

E.T.& Barbara Le Lievre
31301 Bay View Avenue
Fort Bragg, CA 95437

25 November 1991

City of Fort Bragg
416 N. Franklin St.
Fort Bragg, CA 95437

Attention: Matt Huber, Mayor
Patti Campbell, City Council
John Cimilino, City Council
Mary Kendall, City Council
Andre Schade, City Council
Gary Milliman, City Admin.
Scott Cochran, City Plan.
Liz Henry, 4th Dist. Supvr.

References: (1) Letter to Scott Cochran dated 8 Oct. 1991, Subject: Todd Point Development, from Edw. & Barbara Le Lievre
(2) Letter to Scott Cochran dated 17 July 1990 Subject: Development of Traffic Specific Plan, from Edw. & Barbara Le Lievre

Subject: Draft Boatyard Todd Point Traffic Plan & Tier II EIR dated October 15, 1991

Dear People:

The subject Traffic Plan proposes as 1 of two improvements "a four legged intersection with Highway 1 and Highway 20 that would extend Del Mar Avenue from Ocean View Drive past the college to Highway 20 and Highway 1". My wife and I are and everyone I have talked to who owns property on Todd Point is emphatically opposed to this proposed part of the plan. Strong opposition was also expressed and explained in the reference (2) letter dated 17 July 1990. During the public scoping meeting in July of 1990 many Todd Point property owners indicated their opposition to this so callled improvement which would connect HWY 20 to Del Mar Avenue on Todd Point. Since that time the city has not shown any interest in our concerns or opposition to their plan. Summarized below are reasons and explanations for our opposition and proposed alternative solutions.

Noise. As indicated in the subject Traffic Plan the volume of traffic has been increasing and as traffic increases so does the level of noise. In the EIR on page 11 under 3.4. Noise Eric Jay Toll states:

"Traffic noise in a community is one of the major sources of ambient noise levels. If noise levels become excessive, the sound can become a nuisance, a health hazard, or both. One part of the General Plan is a Noise Element. The Traffic Plan adoption may directly result in some changes

related to noise for residences in the Todd Point area." Mr. Toll's statement is vague and elusive. Let me explain. We are aware that to connect HWY 20 to Todd Point and Del Mar Avenue it will be necessary to excavate and remove the 15 to 20 foot embankment that is located directly east of HWY 20. The embankment runs north, adjacent to HWY 1 and has served to protect Todd Point residents from noise at that intersection. If HWY 20 is extended and connects with Del Mar Avenue as proposed a "U" shaped tunnel will be constructed, thus permitting the noise from all the cars, small trucks, commercial trucks, police sirens, sheriff sirens, ambulance and fire trucks sirens, to move and be heard all over Todd Point. Such an increase in the noise level would as indicated by Mr Toll, affect our sleep, be a nuisance, and be a health hazard.

Noise is therefore a very significant issue, but under paragraph 3.4.2 Mr. Toll has only this statement to make titled Mitigation measures:

"(a) Update the noise element to determine the location of traffic noise contours compared to 1980 and determine whether the projected 1995 contours are still accurate. Additionally, provide noise models in the update for changes in circulation patterns projected in the Circulation Element."

That is the entire Mitigation measure in the Environmental Impact Report. After providing page after page of data and justification for extending HWY 20 onto Todd Point only 2 sentences are devoted to a Health Hazard which evades the issue and affectively postpones any real answers and specific mitigation measures. It seems quite doubtful that adequate measures could be taken to mitigate the noise without further damaging the environment and quality of life on Todd Point.

We would like to propose 2 alternative solutions which would greatly mitigate the noise hazard problem and the light and glare problem discussed later.

Alternative 1. A frontage road is planned to be built from Ocean View Dr. north to Cliff House restaurant; extend the frontage road south past the proposed K Mart to the vicinity of the proposed new residential area and drop the plan to extend HWY20 onto Todd Point.

Alternative 2. Extend Harbor Drive south from Ocean View Drive past the Proposed K Mart to the vicinity of the proposed new residential area and drop the plan to extend HWY 20 onto Todd Point and connect to Del MAr Drive.

If the plan to extend HWY 20 is not dropped two (2) additional environmental issues will need to be addressed and solved.

Air Quality. As discussed above it will be necessary to excavate and remove the protective embankment to connect HWY 20 to DelMar Avenue. This U shaped opening will permit the air pollutants, including carbon monoxide and other hazardous chemicals from gas and diesel fuels to flow onto Todd Point. The pollution will be increased by the car and truck traffic which uses the HWY 20 extension. When the wind is from the easterly direction and when there is little or no wind we could have unhealthy SMOG levels on Todd Point.

Light and glare. On page 11 under paragraph 3.5 Mr. Toll states that : "The extension of Del Mar Drive, however, which will result in the construction of a major shopping complex, may result in the addition of new lighting in the area west of Highway 1 on Todd Point." Nothing is said about the nuisance from bright lights and glare caused by the traffic traveling south from HWY 1 onto Del Mar Avenue and north from HWy 1 and 20. We can only surmise that this issue wasinadvertently overlooked. Not only would the lights and glare be a nuisance but it could affect the sleep of some residents. The light and glare problem is yet another reason for us to be opposed to extending HWY 20 to connect with Del Mar.!

Additional Environmental Impacts. If Del Mar and HWY 20 are connected it will be necessary to excavate and remove part of a small hill or large mound and a number of trees both of which contribute to the natural esthetic beauty of the area. The small hill and trees also help to reduce the noise and light glare from HWY 1 and 20.

The above summarizes our opposition to the Todd Point Traffic Plan, our comments and crticisums of the draft EIR and two alternatives to the Traffic Plan, primarily from an objective viewpoint of a Todd Point resident, and property owner.

OTHER comments to Traffic Plan..draft version and draft EIR

The entire Traffic Plan and EIR predicates its analysis and conclusions on a Level of Service (LOS) of D, as stated on page 22 of the Todd Point Traffic Plan as follows:

"For this study the City has selected LOS D as a reasonable compromise between desirable conditions at LOS C with stable flow and tolerable levels of delay and LOS E which is capacity with unstable flow and very undesirable levels of delay. ..." Quoting futher from the bottom of page 21:

(3) Level of Service (LOS) D means that during the peak hour of the day, a ratio is established that is based on setting a goal that as measured through the peak hour, the number of vehicles passing through the Traffic Plan area is equal to 85% of the capacity of the intersections.

LOS A occurs ...of capacity. LOS E is from 86% to full capacity, and LOS F is gridlock." WE ALL KNOW WHAT THAT IS!!

The main reasons I address Level of Service (LOS) is because there seems to be a good chance that if any one of the assumptions Mr. Toll has made is in error or if any data provided from other sources is in error then we could easily move from LOS D to LOS E, or worse to LOS F gridlock. (This is based on approval by the city to build K-MART, Motels etc. on Todd Point) Adding to that significant concern is that it appears these stores and facilities would attract many people and traffic from as far south as Sea Ranch, Gualala, Irish Beach, Point Arena and all communities in between and I could not determine that this was taken into consideration. If not the LOS D might be exceeded and we would be at LOS E, full capacity.

It is believed therefore that this entire community, north, south and east is taking a very big chance of becoming or approaching a gridlocked community. I do not think we should take that chance! Once K MART and the other facilities are approved for construction it will be too late.

The best alternative to avoid the above traffic problems is to plan for building south of Hare Creek, thereby providing for future growth without having to cross either of the two bridges.

Thank you all for your time and patience,

Very Truly,

Edward T. Le Lievre

Edward T. Le Lievre Barbara J. Le Lievre

1. Edward LeLievre

General comment: The Traffic Plan does not result in any changes in existing development patterns. The Plan's implementation results in reducing the building intensity that may be considered when compared to the building intensity permitted by zoning. The Traffic Plan does call for improvements to the street and highway network.

Issue 1: Noise. The EIR projects that there may be impacts related to noise on Todd Point when the Del Mar Drive extension is opened to Highway 20. However, until development is approved on Parcels 090 and 110, the road construction will not take place. The EIR identifies that noise is a development issue. The effects of noise can be reduced to levels of insignificance through a number of conventional engineering and construction design features that are identified in the EIR. Until a development proposal is actually submitted with a design for extending Del Mar Drive, it is not feasible to identify precise noise mitigation. What the EIR is stating is that at this time, the impacts of noise are speculative — when a fixed development proposal is submitted, the environmental analysis for that proposal must address the noise issue in precise detail. This level of detail is being incorporated into the EIR for the K-Mart General Plan amendment.

Issue 2: No Del Mar Extension alternative. This alternative has been rewritten to reflect Mr. LeLievre's comments and to address the issue of Harbor Drive being extended as a frontage road from Ocean View Drive to the intersection with Highway 20. The alternative includes a new concept that was not previously discussed, but may be feasible. See EIR Page 66.

Issue 3: Air quality (from page 3, November, 1991 letter): There is no scientific evidence available to indicate that opening the intersection with Highway 1 and 20 on the west side of Highway 1 for either Harbor Drive or Del Mar Drive would result in the ground-level migration of air contaminants in excess of Federal or State exposure levels. The most recent environmental impact report for the Fort Bragg area, the Homes Lumber Yard, cited data indicating prevailing winds are from the Ocean inland, generally from the northwest and west to the east. This would make it highly unlikely that an air siphoning situation could be created that would effect the Todd Point area.

Issue 4: Light and glare. The section in the EIR has been revised to reflect the issue of traffic headlights turning into the area.

Issue 5: Errors in assumptions. The traffic volume calculations have been prepared by a licensed traffic engineer working on behalf of the City. The data have also been reviewed by independent engineers for two private property owners who agree with the projections. The Traffic Plan and Environmental Impact Report are based on a number of assumptions backed by data summarized in the report or the Appendices. These data support the conclusions.

March 20, 1992
31401 Bay View Ave.,
Fort Bragg, Ca., 95437

City of Fort Bragg, Ca.

City Hall, Fort Bragg

Attn: Mayor Huber & Members of the Fort Bragg
City Council, City Administratir, and City Counsel.

Please refer to my letter of March 13, wherein I respectfully requested a re-hearing as a result of the hearing on the Traffic Circulation Plan held on March 9th. As I mentioned in my earlier letter it was obvious that insufficient time between the availability of the Draft and the date of the hearing to properly prepare for a review.

After studying the Draft, and discussing it with other interested parties, it seems clear that there are enough issues related to the plan to merit a Special City Council meeting.. By holding such a meeting or hearing there would be sufficient time to discuss alternates and review several inconsistencies in the Draft. Mr. Mayor,the fall-out from this Plan if approved and installed not only affects Todd's Pt. residents but the City of Fort Bragg and the North Coast traffic viability.

I, therefore, respectfully request a Special City Council Meeting to for the purpose of hearing all available input concerning the Traffic Circulation Plan encompassing Boatyard and Todd Pt. authored by the Eric Toll Co. as soon as possible. Farthermore Mr. Mayor all future hearings on this subject are I believe important enough to warrant Special Meetings.

Respectfully

Max Hill

the area. The proposed traffic plan will reverse this so that the intersections can handle more traffic than the bridge can put into the area.

h. Additionally, the Plan proposes to reduce the density of development that is currently permitted on each parcel. The average reduction in traffic generated by new development throughout the area is approximately 60% less than allowed by zoning.

Issue 2 (also covers some of Mr. Le Lievre's comments): Harbor Drive alternative. The Harbor Drive alternative is a potentially viable alternative that could be considered as an option to eliminate public controversy associated with the Del Mar extension. The Harbor Drive connection from Ocean View to Highway 20 creates a number of different types of problems that must be balanced against Del Mar Drive. The decision is not environmental but a choice to consider public concerns.

a. All of the environmental issues — noise, air quality, impervious surfaces, and lighting — would remain the same as with the Del Mar Extension. The major changes in effects would be that the Harbor Drive extension results in a steep right curve that will require extensive land area. In order to reduce slope and make the turn at Hwys 1-20-Harbor Drive, the land area would require that the road be extended almost to Bay View Avenue before making a 90° followed by a 180° turn. This turn would still provide headlinght glare into Todd Point at Hwy 1 and 20, but would increase the noise because of the tight turn that would be required.

b. At the Ocean View connection with Harbor Drive, a tight right turn would be required, and stacking distance for a northbound left turn would be reduced. The design would be inconvenient because it requires two tight turns. Southbound traffic from the college, for example, would likely go back to Ocean View and Hwy 1 as a convenience rather than follow a snaking road to Hwy 1-20.

c. A consideration that the City needs to review is that if Harbor Drive were to be constructed as a frontage road, it would reduce the land area and development potential of parcels 8 and 9, which could result in a more expensive road development.

Issue 3: (from March 27) Competition between college traffic and truck traffic. The area would be designed to accommodate both commercial and passenger car traffic. Without knowing specifics concerning deliveries, it would be hard to project to a precise project. However, based on truck traffic patterns in the area, the number of trucks per hour using Del Mar would be insignificant. The calculation with a major retail complex between Del Mar and Highway 1 would average less than one truck per hour. Requiring the development permit to limit deliveries to certain times of the day can easily mitigate this issue.

Issue 4: Frontage Road west of highway 1. The frontage road from Ocean View to the Cliff House is a given part of the existing environment. It may create future traffic conflicts with Ocean View Drive, but the City is committed to this issue. A statement of overriding consideration may be needed.

Issue 5: At the May hearing, Mr. Hill presented calculations on traffic issues. The format used by Mr. Hill has been adapted by Traffic Engineer Barnard C. Johnson, PE, to show how the traffic constants were used to calculate traffic in the Plan area.

Land use reflecting the density that was called "credible build-out" in early versions of the Plan. *These figures do not represent "duplicate" or "pass by" traffic.*	***Size***	***Trips per day***
Mobile homes	40 units	192
Restaurants (proposed)	13,700 sq. ft.	4,170
Retail stores (proposed)	273,500 sq. ft.	25,925
Community College (including full expansion)	3,600 students	2,304
Service station	6 pumps	870
Light industry (fishing)	50,000 sq. ft.	349
Motels	244 rooms	2,099
Single family homes	50 units	478
Apartments and condos	227 units	1,496
Total future traffic		**37,883**
Trips to and from (production/attractions)		
Attractions	33,618 per day	
Productions	4,265 per day	
Net new traffic at Plan area perimeter	*29,353* per day	
Adjustments to traffic. Refer to the explanation about the traffic budget in the Plan.	-21,613	
Net new traffic in the Plan area	***7,740***	
Peak hour traffic (10% of average daily traffic)	**774**	
Distribution to the Noyo River Bridge (60%)	464	
Directional split (50% northbound onto bridge)	232	
Existing peak hour traffic on bridge	**1,200**	
+ Normal growth rate not including new traffic	126	
+ Plan are new traffic onto the bridge	232	
Total traffic existing, future, and plan peak hour	***1,558***	

The bridge capacity is observed at 1,600 vehicles per hour. This chart explains how the Plan concludes that at the build-out allowed by the Traffic Plan places 1,590 vehicles per hour, Friday summer peak hour, onto the Northbound Noyo River bridge's single lane.

Century 21
Seascape Realty
40580 Little Lake Street
P.O Box 583
Mendocino, California 95460
Business (707) 937-2121
Fax (707) 937-0344

P.O. Box 373
Little River, CA 95456
March 24, 1992

Scott Cochran, Planner
City of Ft. Bragg
416 N. Franklin Street
Ft. Bragg, CA 95437

Dear Scott,

In reviewing the revised draft version of the Boatyard and Todds Point traffic plan I was surprised to see that the left turn lanes into Del Mar Drive had been eliminated. Being a resident of the Mendocino area it is important to me that there is an easy way of accessing the proposed development at Todd's Point and the College of the Redwoods. According to the map on page 32 of the plan there is 300 feet between the end of the bridge and the Highway 20 intersection. There would be enough room for there for at least 6-8 cars to turn left if two lanes were used.

The first 100 feet south of the intersection with Highway 20 could be used for dual left turn lanes. This would allow for two lanes with at least 3 cars each. The next 100 feet could be used for a transition phase from the dual lanes. The last 100 feet to the bridge would be a single lane.

Mendocino residents never seem to be considered when decisions are made. Access at Ocean Drive will mean a long delay because we will have to wait through several light changes to make a left into Kmart and other shops that will open there. And then a long route around to the stores. The scenario that I see developing is that many people will make a U-turn after they pass Highway 20 and swing back to enter at the Del Mar entrance. It seems like better planning and safer to have two entrances for traffic coming from the south, one at Del Mar (Highway 20) and another one at Ocean Drive. That way neither of them will become overloaded with cars and the traffic will flow smoother. After all everyone knows that two is better than one.

I hope that you will look into this and give the people living south of Highway 20 due consideration in your planning.

Sincerely,

Bill Crecelius

Bill Crecelius

3. Bill Creceliums

This issue has been addressed in the Plan, and the left turn lane at Del Mar is now an option.

SIERRA CLUB - REDWOOD CHAPTER

~~P. O. Box 466, Santa Rosa, Ca. 95402~~

MENDOCINO-LAKE GROUP
COASTAL CONSERVATION COMMITTEE
29900 Highway 20
Fort Bragg, California 95437

MAR 28 1992

March 9, 1992

RECEIVED
MAR 10 1992
CITY OF FORT BRAGG

Fort Bragg City Council
City Hall
Fort Bragg, California 95437

RE: DRAFT BOATYARD TODD POINT TRAFFIC PLAN & TIER II ENVIRONMENTAL IMPACT REPORT

Members of the Council:

The Sierra Club remains concerned for extreme future Highway One traffic difficulties which are inherent in any attempted implementation of the present Draft Plan.

According to the Draft Plan, and to the consultant's testimony at tonight's public hearing, increased Highway One traffic volumes which will be created as a direct result of the Draft Plan's implementation will result in traffic blockages on both the Noyo River and Hare Creek bridges. We believe that a major and inexcusable failure of the Draft Plan is its failure to include both bridges within the Planning Area. These bridges are a major constraint on South Fort Bragg traffic flows, and clearly must be taken into consideration in any valid South Fort Bragg traffic plan, including a Boatyard - Todd Point traffic plan.

We wish to reiterate our November 1, 1991, request that an alternative plan be prepared that would maintain traffic congestion in South Fort Bragg at no worse than its present severe and relatively slowly increasing levels.

We wish to request, in addition, that such an alternative plan include both the Noyo River and Hare Creek highway bridges.

Thank you.

Ron Guenther
Co-Chair
Sierra Club Coastal Conservation Committee

Copy to: Eric Jay Toll
Carson City, Nev.

4. Ron Geunther on behalf of the Sierra Club

Issue 1: Inclusion of the bridges within the Plan area. The two bridges are included in the Plan area. The bridge capacity during the typical peak hour is the controlling factor on how much traffic and development is possible within the Plan area. The traffic plan accommodates the Sierra Club's request by maintaining traffic between the bridges at reasonable and safe volumes. The issue of widening the two bridges has been added to the EIR's alternatives.

FORT BRAGG CITY COUNCIL MEETING
MARCH 9, 1992

COMMENTS BY: HAROLD R. PLATT
19100 NEPTUNE AVE - - TODD POINT 961-9676

GOOD EVENING:

THE CONCERNS AND ISSUES, LIKE GROUND WATER, ARE WELL COVERED BY OTHERS, AND WITH WHICH I CONCURE.

MY COMMENTS ARE FORMULATED FROM INFORMATION CONTAINED WITHIN THE CURRENT BOATYARD & TODD POINT TRAFFIC PLAN, PLUS SOME PERSONAL OBSERVATION AND OPINIONS - - ALL WITH CONCERN TO THE EFFECT ON US TODD POINT OWNERS AND RESIDENTS.

THE FACTS: TWO BRIDGES THAT "THERE ARE NO PLANS TO WIDEN IN THE FORSEEABLE FUTURE". A DEVELOPER THAT NATURALLY WANTS TO PUSH FOR THE VERY HIGHEST USE, AND A CITY THAT WOULD LIKE THE REVENUE.

A FEW QUOTES FROM THE "TRAFFIC PLAN"

"TO ENSURE THAT DEVELOPMENT DOES NOT CREATE GREATER PROBLEMS IN THE AREA THAN WERE EXPERIENCED AT THE TIME THE ELEMENT WAS ADOPTED".

"THE MAJOR PROBLEM FOR TRAFFIC WILL BE THE INTERSECTION OCEAN VIEW DRIVE, BOAT YARD LOOP & HWY 1.

"THE ROAD EXTENSION SHOULD NOT ALLOW OR ENCOURAGE TRAFFIC ACCESS TO THE TODD POINT RESIDENTIAL AREAS".

"ROAD DESIGN - TO MINIMIZE IMPACTS TO EXISTING RESIDENCES".

"TRAFFIC PLAN IS THAT THERE IS MORE TRAFFIC LIKELY TO BE PRODUCED AND ATTRACTED TO THE AREA THAN THERE IS CAPACITY TO MOVE THAT TRAFIC IN A SMOOTH AND EFFICIENT MANNER."

"THE FACT IS THAT THE LAND USE ENTITLEMENTS NEEDS TO BE REDUCED."

YET THE PLAN IS TO SEND ALL NORTHBOUND TRAFFIC TO THE OCEAN VIEW INTERSECTION FOR ACCESS TO THE K-MART, AND OTHER BUSINESSES.

THEN THE SOUTHBOUND, AND BOATYARD LOOP WOULD BE USING THIS ACCESS.

ANOTHER QUOTE - "IT IS ANTICIPATED THAT GROWTH AND DEVELOPMENT WILL TAKE PLACE IN THE NEXT 20 YEARS".

YET - UNDER PROJECTED DEVELOPMENTS ENTITLEMENTS: K-MART, MOTELS, ETC.

"OVER 80% OF AVAILABLE TRAFFIC CONSUMED BETWEEN THEM."

THAT IS NOW!

TO EXPLORE - WHILE THE PROPERTIES HAVE NOT BEEN DEVELOPED, AND LAND USE IS FLEXIABLE - WIDEN HWY 1 IMMEDIATELY NORTH OF HARE CREEK BRIDGE. MAKE A SUPER INTERSECTION AT THE HWY 1, HWY 20 INTERSECTION AND EXTENSION TO THE WEST. ALL THE DEVELOPMENT AND COLLEGE TRAFFIC TO USE THIS ENTRANCE, AND LEAVE OCEAN VIEW FOR TODD POINT, WITH AN EMERGENCY ENTRANCE FROM OCEAN VIEW.

OBSERVATION: THE NEWLY BUILT OCEAN VIEW / HYW 1 ENTRANCE DOES NOT MATCH THE PROPOSED USE.

EMERGENCY VEHICLES: SIGNED TURNOUTS AT BOTH ENDS OF BOTH BRIDGES, ACCUATED BY THE 911 OPERATOR WITH FLASHING LIGHTS TO HELP CLEAR BRIDGES FOR THE EMERGENCY VEHICLES.

HRP

5. Harold R. Platt

Issue 1: The "super intersection" at Highway 1 and 20. The Plan has been rewritten to provide this option for the engineering design.

Issue 2: Emergency turnouts. The EIR has been amended to include a mitigation measure requiring adequate shoulder space to pull over to leave room for emergency vehicles.

Margaret and Ronald Reiter
13501 Ocean View Drive
March 30, 1992

Mr. Scott Cochran, Planning Assistant
City of Fort Bragg
416 North Franklin Street
Fort Bragg, California 95437

Re: Comments on Boatyard and Todd Point Traffic Plan and Tier Two Environmental Impact Report

Dear Scott:

In accordance with your advice that public comments on the above would be accepted through March 31, 1992, we submit the following comments. In subsequent conversation with Eric Toll we learned that the comment period had closed on the Environmental Impact Report. Since we did not receive any information on the process after the scoping meeting from the City or its consultant, as had been promised, we ask that we may be permitted to submit additional comments on the environmental impact report. Please advice if that will be possible. We also understand that because this is not a specific plan, but a proposed addition to the general plan, actual traffic improvements will not go forward without a separate EIR to deal with the light, noise, safety and water impacts, among others, of the street improvements and for that reason the city will not entertain discussion of those issues in relation to this proposed traffic plan.

Although we are certainly not experts in traffic planning, we believe the proposed plan suffers from several major problems and numerous smaller flaws that make it unacceptable without significant improvements. Most notable among the problems are the following:

1. Although the plan purports to establish traffic level of service guidelines for intersections within the plan, it notably fails to disclose the effect of the plan on the level of service at Noyo Bridge.

2. The plan provides no analysis of why traffic level of service D should be the goal.

3. The plan purports to allow traffic at level of service "D," but between the time of the draft and the revised draft, has changed to a disguised level E ("capacity reached, unstable flow, undesirable levels of delay").

4. Although the plan purports to establish level of service for the plan area as level D, the circulation element goal does not clearly reflect

that goal and might allow a much worse level of service.

5. The analysis of whether traffic generated is significant is confusing, prone to error and may result in both under and over development.

6. The plan appears to be patched together from various drafts with missing and erroneous page and table references, making it difficult to know whether it will be adequate in its final form.

7. The plan fails to consider the priorities of the Coastal Act and the local county plan that also encompass the plan area.

8. The city has taken on itself the task of developing the plan that will impact residents of the county outside the city, without providing county residents adequate notice or opportunity to have fair representation in the decision-making.

1. Although the plan purports to establish traffic level of service guidelines for intersections within the plan, it notably fails to analyze the effect of the plan on the level of service at Noyo Bridge.

Although the draft states that the traffic level of service of Noyo Bridge by the year 2000 will be level D (p. 10.), it also states at page 24 that the bridge is already at level D. It doesn't add up.

The plan states that two-lane highways are generally agreed to have a capacity of 2800 passenger cars per hour. (pp. 21-22.) Then the plan states that a reasonable estimate of the capacity of the narrow two-lane bridge, which has no shoulders is also 2800. There is no explanation why one should assume that the narrow bridge has a traffic capacity equal to an ordinary two-lane highway with wider lanes and shoulders. Nevertheless, assuming the bridge capacity is correctly determined, the plan states that the bridge is currently operating at level of service D. It appears that the V/C would currently be approximately .86, although the plan does not tell us what the V/C is, other than level D, which might be from .81 to .90 V/C. (p. 24.) The plan states that additional growth will push the bridge toward capacity level E. (p. 24.)

What, exactly, will be the impact of the amount of traffic the plan proposes to allow? What level of service is the City prepared to

accept? The plan indicates that approximately 60% of all trips generated by new developments of the kinds proposed will bring new traffic into the plan area. (p. 30.) Approximately half of those will enter the area from the north, across Noyo Bridge. (see p. 24.) The plan indicates that a primary function of the proposed 14 lane intersection at Ocean View Drive will be to route all northbound traffic heading for the K-Mart development via left hand turns off of Highway 1 onto Ocean View Drive. (pp. 31-32.) Yet there is no analysis of the effect on the Noyo Bridge traffic of increasing the stop light length at Ocean View to allow for such a large volume of left hand turning vehicles onto Ocean View Drive. Won't the longer stops required back traffic up toward Noyo Bridge? What about the safety impact on Noyo Bridge of having two lanes of traffic, as proposed, entering it from the south and having to merge onto the one lane north across the bridge? (see p. 32.)

2. **The plan provides no analysis of why traffic level of service D should be the goal.**

The plan simply states that the council has already decided that the level of service should be D. The plan indicates that, except at Noyo Bridge, traffic in the area currently operates at a level of service B to C. In other words, the plan proposes to allow the traffic to deteriorate dramatically over the next 10 years. The Coastal Act places emphasis on protecting, maintaining and where feasible enhancing and restoring the overall quality of the coastal zone environment. It notes that tourists, from which the local economy benefits greatly, are attracted to the "uncrowded" rural character of the county. In conversations with Mr. Toll, he indicated that level D is dictated by economics. If there is a rationale for why the plan goal should be to reach level D, then it should be stated, rather than unstated, and an explanation of how such a level of service is consistent with the Coastal Act should also be included.

3. **The plan purports to allow traffic at level of service "D," but between the time of the draft and the revised draft, has changed to a disguised level E ("capacity reached, unstable flow, undesirable levels of delay").**

Level of service D is a volume of traffic to capacity of the roadway ratio of .81-.90. The initial draft of the plan stated,

> "The <u>middle of this range at V/C .85 is the desired maximum figure representing the worst condition to be tolerated as a planning goal.</u> . . . . The whole peak hour, however, will average out at LOS D and a V/C ratio of 0.85."

The revised draft, without explanation, now states that the "study target intersections have a Target Level of Service "D" (V/C 0.90) established by the City Council with the adoption of this Traffic Plan." Suddenly, the goal went from the worst condition to be tolerated to 5 points worse=.90. Level E begins at .91 and is described as capacity flow, undesirable levels of delay, unstable flow. If one thing is clear from reading this draft it is that traffic planning is an uncertain science. Slight changes in assumptions can change the expected amounts of traffic. As now drafted, the plan allows no margin of error from planning "not to be tolerated." Although there seems to be no explanation offered, it appears that this change may have resulted in the revised plan allowing an extra 1000 trips per day to be distributed among the parcels. (Per conversation with Eric Toll, average daily traffic trips threshold to be 1478 rather than 1375; see also p. 39, note 11 and related text [volume capacity ratio remaining seems to have changed.05 by this expedient. The reference in the text to .21 remaining ratio seems a left over from the previous draft, while the footnote has been revised to .26.].) If the plan intends to allow traffic at level E, it should say so. Clearly, however, such a level of traffic would not be good planning, good business or allowable under the Coastal Act.

4. **Although the plan purports to establish level of service for the plan area as level D, the circulation element goal does not clearly reflect that goal and might allow a much worse level of service.**

Although the plan purports to establish a goal of level of service D, the plan goal seems not to prevent a level of service E. Level E means the traffic volume is "at capacity" for the road network. Goal TP1 allows traffic to increase up to the point it does not exceed the road network level of service. That would appear to be, "capacity." This needs to be clarified. It should be specific as to the ratio, so that, as discussed above, level D is not in fact, a disguised level E. The goal should also make clear if it intends to allow Noyo Bridge level of service to deteriorate from its current level of service. As discussed above, that seems to be the unstated intent. Indeed, it may be impossible to prevent the level of the Noyo Bridge from deteriorating to level E, even without massive development. The plan should consider whether a moratorium on major developments should occur until the bridge is widened or the eastern bypass is developed.

5. **The analysis of whether traffic generated is significant is confusing, prone to error and may result in both under and over development.**

The plan goes carefully through a series of charts, tables, diagrams and discussion of existing traffic. When it arrives at

the point of allocating future traffic, however, it jumps to an average daily traffic analysis. There is no diagram, chart, figure or analysis, demonstrating how the average daily traffic flow from those allocations will impact various intersections. The major proposed project is a shopping center, which presumably will increase traffic during the local peak hours around noon and between 3 and 5 p.m. Traffic for such a development may have a greater impact on level of service than its average daily traffic would suggest. Average daily traffic also underestimates the seasonal difference in peak traffic flows by approximately 10%. There is no clear explanation, for example, of how peak hour traffic capacities are translated to average daily traffic capacities. (see p. 39.) Yet the "decision tree" seems to indicate that a development creating less than the "new" allocation of traffic is automatically determined to be not significant. (p. 44.) (Assuming that is the intent, the intent is not at all clear in the implementation measures.)

Traffic has a way of seeking alternatives to speed along, in ways that may increase peak hour trips. An example may be helpful. A K-Mart type project might greatly increase the burden on the Ocean View Drive Highway 1 intersection. Northbound drivers must make their left turns into the K-Mart development there. Increased traffic making left turns at Ocean View could cause southbound drivers stopped at the Ocean View light to attempt to cut their travel time by making right turns not prevented by the stop light onto Ocean View, come through the Del Mar cut off and reenter Highway 1 with a right turn at Highway 1 and 20. Increased traffic eastbound away from the K-Mart project and westbound into it would presumably make left turns out of Boatyard onto Highway 20 more difficult than what is already described as level of service D. Boatyard shoppers wishing to go east might take the Boatyard loop north, turn left onto Highway 1 and left again at the Highway 1 and 20 intersection, thus increasing the impact on both the Ocean View and Highway 1 and 20 intersections more than expected, without careful analysis. The plan does not provide convincing documentation that its average daily traffic allocations provide a reasonable floor under which traffic impact is not significant.

The plan assumes a V/C during peak hours through all intersections is .58. (p. 39) The plan, however, states that the V/C at Highways 1 and 20 is currently .60. (p. 25) To the extent the .58 reference at page 39 refers back to the .58 V/C ratio for Ocean View Drive, it seems to pull something out of whole cloth. Although the Ocean View intersection is listed at a V/C of .58, if the intersection were signal controlled, there is no information given about the current capacity of the intersection, or how capacity was determined, which, along with the current peak hour flow, is necessary to determine the ratio. Also, as discussed above, it totally ignores the V/C ratio of the Noyo Bridge. The

discussion on page 39 also is not clear as to whether the natural traffic growth of .06 mentioned is for a one year or ten year period. It does not seem to correspond to figures mentioned elsewhere for natural growth of traffic.

The implementation measures do not clearly set forth the desired actions, as set forth more clearly in the decision tree. They also seem to imply that the City can not question the opinion of the traffic engineer who does the study for the applicant. Obviously, the City should not be bound by its own language to the results of a questionable study. It is not clearly demonstrated that the procedures set forth in Appendix C (which was not attached to the draft) guard against improper opinions given by traffic engineers hired by developers.

6. **The plan appears to be patched together from various drafts with missing and erroneous page and table references, making it difficult to know whether it will be adequate in its final form.**

Because of the missing references and errors due to changes in the drafts, it is difficult to fairly evaluate the plan until it has been edited and corrected. (see, e.g., p.39, note 11, p. 19, etc.)

7. **The plan fails to consider the priorities of the Coastal Act and the local county plan that also encompass the plan area.**

The County Coast Plan dictates that visitor serving development takes precedent over other forms of development and calls for commercial development to be within or contiguous to developed areas. The proposed traffic plan, however, states that it "attempts to accommodate the proposals as they have been presented to the City," apparently without regard to whether developing traffic plans based on proposed development, rather than on development consistent with the Coastal Act was appropriate.

Highway 1 is a designated Bikecentennial Route, according to the Mendocino County Local Coastal Plan. When the plan was adopted, it stated that on a typical summer day 50 or more bicyclists used segments of Highway 1. The coastal plan suggests a goal of 4 foot wide bicycle lanes, wherever not environmentally detrimental. (see policy 3.6) The plan also envisions access way along the highway where development intensity will result in pedestrian use. The proposed traffic plan notes that there is little pedestrian or bicycle use of the plan area. Currently, the plan area is not friendly to use by pedestrians or cyclists. One way to reduce trips among the various developments would be to make pedestrian and bicycle access available. Another way might be to have a shuttle bus between the two shopping centers. These alternative means of transportation have been completely ignored in the

proposed plan. In an area where mixed use residential, motel, inn, restaurant and shopping are to be provided, surely these alternative means of transportation should have been considered.

8. **The city has taken on itself the task of developing the plan that will impact residents of the county outside the city, without providing county residents adequate notice or opportunity to have fair representation in the decision-making.**

The proposed plan does not comply with the Coastal Act. Among the primary goals of the Coastal Act is the goal to encourage state and local cooperation in preparing procedures for implementing, coordinating and developing the area for mutually beneficial uses, including educational uses. The Coastal Act calls for the widest opportunity for public participation in coastal planning activities. Here, the major developments proposed are all within the city, but the impacts will be most directly felt by the county residents of Todd's Point.

We, along with other residents of Todd's Point attended a scoping meeting some time ago on this issue. The city and the consultant promised at that meeting to provide us minutes of the meeting, a list of those in attendance and to keep us informed of future developments. Despite several requests over the following weeks and months, we received no minutes, list of participants, or notice of any further developments on this issue. Whenever residents of Todd's Point speak up, they are told, this is not about the K-Mart project. Yet by its own statement, the proposed traffic plan is very much motivated by the proposed K-Mart. We appreciate certain steps that have been taken to address the concerns of Todd's Point residents. We believe, however, that the process has unfairly deprived county residents of a voice in the process. Inadequate thought has been given to the impact of a 14 lane intersection to bring a large percentage of the traffic headed for the proposed project into Todd's Point; the fact that the city's zoning is woefully out of sync with the realities of the traffic situation and must be dealt with first; and the serious environmental concerns connected not just to future development, but to the proposed traffic plan itself. The lack of cooperative planning also showed up in the hearing in which it became evident that Cal Trans had different plans for the Ocean View intersection. Cal Trans plans will certainly impact the amount of traffic, but had not been considered in the draft plan. We question whether there has been adequate notice and representation for county residents for this process to comply with statutory requirements.

Conclusion:

Although this is long, it addresses only some of the most obvious

problems with the proposed plan. We understand that the plan has moved forward in part to facilitate the proposed developments and in part to control them. We understand the necessity of having a better plan in place to prevent virtually unlimited development, should a developer wish to pay the costs of improvements. We hope that the plan can be improved so that it provides an adequate basis for future planning. We urge, however, that the city consider the necessity of reviewing the zoning of the area as soon as possible. The current zoning and the proposed zoning amendment both seen to place impossible burdens on the capability of the area and are of questionable benefit.

Sincerely,

Ronald and Margaret Reiter

6. *Margaret Reiter*

Issue 1: Bridge Level of Service. The Plan discloses that during peak hour, the Noyo River Bridge will be at Level of Service E, close to its maximum capacity. See the response to Max Hill's letter on EIR Page 39 for the calculations.

Issue 2: The record for the project includes a study session with the City Council in January, 1992, at which the decision was made to use Level of Service D as the standard. This is a direction of the Council at the Study Session, and represents a realistic and affordable objective.

Issue 3 and 4: The Level of Service concept has been better explained in the Plan. The comments represent the correspondent's beliefs on the issue.

Issue 5: Errors in data. Data and calculations have been clarified. A more comprehensive analysis in Table 7 to determine "significance" has been added to the Plan.

Issue 6: Sloppy editing. The Plan has been re-edited to eliminate confusion and contradictions.

Issue 7: Coastal Act consistency. The Plan carries out the directive of the Coastal Act to prepare a program for improvements and funding. See Local Coastal Plan Policies XV-6 and XV-7.

Issue 8: Noticing requirements. The City has following appropriate and adequate noticing requirements.

Issue 9 (Item 1 on page 2): Bridge level of service. Noyo River Bridge traffic — except during special events — is currently as low as Level of Service E at times. The Plan states that with development at the densities permitted in the Traffic Plan, the bridge's average peak hour level of service will be E, between 91% and full capacity. The discussions of road capacity have been rewritten completely to eliminate the confusion. The technical discussion is not included in the Traffic Appendix Binder. The City will accept no less than Level of Service D at the intersections and Level of Service E on the Noyo River Bridge. The Hare Creek bridge will be at level of service D, but under the traffic Plan would be allowed to reach capacity. Based on traffic projections, this is not likely to occur. The data are included in the Plan and Appendix.

Issue 10 (Item 2 on page 3): Level of Service D selection. This a discretionary decision of the City Council. If the Plan is adopted, the City has selected LOS D. The Level of Service C alternative is not feasible without widening the Noyo River Bridge. There is no means to meet project objectives of accommodating *existing* as well as future traffic, and construct roads to meet Level of Service C at the intersections during peak hours.

Issue 11 (Item 3 on page 3): "Purported" change in Plan's Level of Service goal. The change from using V/C 0.85 to V/C 0.90 was based on discussions at the January public hearing in testimony and substantiated data presented by a property owner's traffic engineer. The Council's direction was to recalculate the Plan's capacities based on V/C 0.90 at the intersections. It should be noted that without the bridges being widened, the intersections' Volume/Capacity (V/C) ratio will actually be closer to 0.85 for both Highway 1-20-Del Mar and 0.88 for Highway 1-Ocean View-Boatyard.

Issue 12 (Item 4 on page 4): Lack of clarity concerning capacity. Goal TP-1 has been clarified to lock in the Level of Service D.

Issue 13 (Item 5 on page 5): See discussion on Issue 5 on previous page.

Issue 14 (Item 6 on page 6): See discussion on Issue 6 on previous page.

Issue 15 (Item 7 on page 7): Relationship to the Mendocino County Local Coastal Plan. The subject property is located within the City of Fort Bragg, and is not subject to the provisions of the Mendocino County Local Coastal Plan. The area falls under the Fort Bragg Local Coastal Plan. The City's circulation element addresses the issue of bicycle and pedestrian access along the coast. It should be noted that there is no pedestrian or bicycle access permitted by CalTrans on either the Hare Creek or Noyo River bridges.

Issue 16 (Item 8 on page 7): City's use of its planning powers. The correspondent expresses beliefs about the relationship between the City and County, its noticing procedures, and planning powers. These are not related to the proposed project.

RAYMOND HALL
DIRECTOR

TELEPHONE
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COUNTY OF MENDOCINO
DEPARTMENT OF PLANNING AND BUILDING SERVICES
MAILING ADDRESS: COURTHOUSE
UKIAH, CALIFORNIA 95482

March 17, 1992

Scott Cochran
City of Fort Bragg
416 North Franklin
Fort Bragg, CA 95437

Subject: Draft Boatyard and Todd Point Traffic Plan
dated March 9, 1992

Dear Scott:

Thank you for the opportunity to review the above referenced document received by this office on March 11, 1992. Attached are notes in the margin of typically minor comments or corrections to the Plan. More significant comments are as follows:

A. The Plan continues to consider a level or intensity of development in the unincorporated area of South Harbor Drive much greater than allowed under the certified Land Use Plan (LUP) designation of "Fishing Village." One option that clearly needs to be investigated is a scenario based upon development consistent with the LUP. Would this change any of the traffic improvements recommended in the Plan? How would it modify the apportionment of the "fair share"?

B. Am I reading Table 4 correctly that development of Parcel 9 (K-Mart) would utilize 9.84% of the critical lane volume of Ocean View-Highway 1 while development in the South Harbor Drive area would utilize 9.36%?

C. As stated in my letter to you dated December 4, 1991, the road improvements advocated in the Traffic Plan would appear to provide varying benefits to the land owner depending upon distance from the proposed improvement. For example, the extension of Del Mar Drive would provide much greater benefit to adjoining landowners than those parcel owners along South Harbor Drive. Is there any process established in the Plan to address this discrepancy?

D. Why has the upper level of Service Level D (0.90) been identified as acceptable rather than the mid range (0.85)?

Sincerely,

Ray Hall

Raymond Hall
Director

RH:DAW
cc: Board of Supervisors
Planning Commission
Mike Scannell, CAO
Budge Campbell, Public Works
Jerry Heath
Gary Berrigan
Highway 1 File
Fort Bragg File

Mendocino County Planning and Building Department

All of the issues raised in the letter were revised in the Plan.

4 Summary of environmental issues

4.1 Conformance to plans

The proposed project results in a change to the Fort Bragg General Plan Circulation Element. The Traffic Plan does not result in the development of any policies which are internally inconsistent to the remainder of the General Plan. The Plan does propose a restriction on the development entitlements for parcels within the Plan area. This is implemented through the enactment of a Traffic Restriction (TX) zoning district. The Traffic Plan does not have significant environmental impacts associated with land use and policy conformance. The Element, in effect, is a response to the existing land use patterns that have been developing in Fort Bragg since the adoption of the General Plan in the early 1980s. No mitigation or changes to the proposed element are required.

4.2 Earth

4.2.1 Summary of major findings

There is one potential indirect impacts associated with earth. This is the effect of soil compaction and overcovering. When new roads are constructed or improved as a result of the policies included in the Plan, the road beds require compaction and overcovering of native earth. When overcovering occurs, the existing earth surface is compacted or covered with an impermeable material. This disrupts the ability of the soil to allow water to be absorbed, and increases the run-off. When water run-off increases, it carries with it soil and other surface matter. These are called "sediments," which can then be carried into water courses. Additionally, an increase in compacted areas results in a decrease in area serving as a collection for aquifer recharge.

Depending on the location of a new road, the grading that is required, or the height of cuts and fills, there is a possibility that the activity could have significant effects related to increased erosion. The slopes that are created from constructing a road need to be stabilized and protected against erosion. There are a number of methods that can result in a reduction of erosion impacts to levels of insignificance, but these cannot be defined until a specific project is proposed for design and development. In most cases, the impact can be eliminated as part of the design so that no mitigation is necessary.

4.2.2 Proposed mitigation

(a) Any proposal to construct a new road or reconstruct an existing road shall require that the engineering firm designing the road alignment, grade, and structure address the effects of surface run-off on erosion-prone surfaces.

4.3 Water

4.3.1 Summary of major findings

The Traffic Plan will result in the construction of an extension of Del Mar Drive from Ocean View Drive to the intersection of Highway 1 and 20. The construction of this road will indirectly result in the development of a major shopping complex west of Highway 1 on presently undeveloped land. The indirect effect that may result is that there will be a decrease in the pervious surface through which rainwater percolates into the groundwater supply for residential parcels on Todd Point. This issue was raised that the study session on August 26, 1991.

The issue relates to whether the groundwater supply for the residences on Todd Point is a perched aquifer located solely in the area west of Highway 1. The Traffic Plan, while providing the ability for development, does not provide a development entitlement. A General Plan amendment is pending for the area shown in Figure C of the Traffic Plan as Map Parcel 11. A Local Coastal Permit will be required for the parcel shown as Map Parcel 9. Because these projects will require detailed environmental review, the impact on groundwater is best discussed in the project EIR.

4.3.2 Mitigation measure

(a) Require that analysis impacts to groundwater be incorporated in environmental review for projects resulting in increases in impervious surfaces. This measure defers the analysis to the project-specific EIR. While it is an important, possibly critical issue, the pending preparation of the K-Mart project EIR does provide the most precise forum for this analysis.

4.4 Noise

4.4.1 Summary of major findings

Traffic noise in a community is one of the major sources of ambient noise levels. If noise levels become excessive, the sound can become a nuisance, a health hazard, or both. One part of the General Plan is a Noise Element. The Traffic Plan adoption may directly result in some changes related to noise for residences in the Todd Point area.

If traffic is able to move more smoothly on Highway 1, this can actually result in a decrease in traffic noise. The reason is that traffic noise is highest when vehicles have to slow down, stop, and then resume traveling speed. Vehicles with manual transmissions, and especially commercial trucks, generate more noise when gearing up and down than when they are able to move at a sustained speed.

Property owners have expressed concern about noise patterns if the hillside blocking noise from Highway 1 and 20 is opened to allow the Del Mar extension. This could provide a channel for noise into the Todd Point area.

Methods of reducing the impacts of noise are well documented. The standardized systems can range from simple landscaping to complex systems of sound walls and structural mitigation.

4.4.2 Mitigation measures

(a) Update the noise element to determine the location of traffic noise contours compared to 1980 and determine whether the projected 1995 contours are still accurate. Additionally, provide noise models in the update for changes in circulation patterns projected in the Circulation Element.

(b) Require that project development proposals calculate mobile noise source contours from new streets, roads, or parking areas and establish a mitigation program for noise determined to be significant in the project-specific EIRs.

4.5 Light and glare

4.5.1 Summary of major findings

The proposed project does not provide for the addition of any new lighting sources. It may be possible that when new roads are constructed, street lights could be a part of the project. If this is the case, the effects of light and glare may be significant. This is an issue for which site specific studies will be needed. The extension of Del Mar Drive, however, which will result in the construction of a major shopping complex, may result in the addition of new lighting in the area west of Highway 1 on Todd Point.

The traffic moving from Highway 1 onto the new road network west of the highway could create light and glare for residents in areas that do not have vehicle access. The lights from vehicles may be reflected skyward or into residences in greater numbers or at areas where there is no traffic lighting.

4.5.2 Mitigation measures

(a) Require project review of development in the Plan area to include an assessment of the project-specific effects of lighting on the residences in the project area. Project proposals shall incorporate methods of block vehicle headlight glare into residential areas. This is to be developed as a part of the intersection, street, and parking area designs.

4.6 Traffic and circulation

4.6.1 Summary of major findings

The Traffic Plan is a refinement and implementation of the Circulation Element for the south Fort Bragg area. It is intended to implement a requirement of the Local Coastal Plan and to carry out the implementing program of the Element itself.

The need for these improvements are detailed throughout the findings in the Traffic Plan and the Circulation element as a means of resolve the problems associated with traffic flow in south Fort Bragg. The discussions may be found in the summaries of major findings that lead the various sections of the Traffic Plan.

For this reason it is not necessary to repeat each of the implementing programs that are identified in the proposed Circulation Element.

4.6.2 Mitigation measures

The Tier II Environmental Impact Report, Traffic Plan, and Circulation Element are incorporated as one document. The implementing programs are listed beginning on page 32 of the Traffic Plan.

4.7 Public facilities and services

4.7.1 Summary of major findings

The proposed Traffic Plan involves the construction of new road segments. The roads will need to be maintained, which could result in increases in the City's road maintenance budget.

4.7.2 Mitigation measures

(a) As the budgets are developed for constructing the proposed road extensions, the City shall provide an estimate of annual maintenance costs to the Mendocino Council of Governments in order to ensure that the County of Mendocino Department of Public Works receives adequate funds for ongoing road maintenance.

5 Cumulative effects of the project

Cumulative effects are environmental impacts which are not significant when the are viewed in isolated circumstances, but when they combine with other aspects of the project or similar offsite environmental impacts, the sum of the effects become significant.

When viewed as a part of the overall General Plan, the Traffic Plan does not provide any cumulative impacts, but in effect is in response to cumulative effects generated by other aspects of the General Plan. This statement is based on conclusions associated with the fact that there are direct development entitlements that are made possible by the project.

If the Plan is approved as proposed, it is intended to serve as a relief action for the existing circulation and transportation patterns in the Boatyard/Todd Point area. The proposed Plan provides a means of reducing densities to ensure an even distribution of available traffic while

still maintaining the targeted Level of Service D. The Plan itself centers on assessing and mitigating potentially significant cumulative impacts.

6 Growth inducing impacts

The proposed project, however, does respond to growth-inducing pressures that have occurred as a result of the Land Use element and the Local Coastal Plan. Development is pending on the south Fort Bragg area which, if allowed to move forward in concert with the maximum development potential would overload the street system. If the proposed new roads are constructed, they will provide opportunities for development on parcels which now would have difficulty handling the necessary improvements. The Plan provides a system for handling the growth inducing impacts in a manner to offset potential traffic problems. This is the implementation program of the Traffic Plan.

7 Effects found not to be significant

Virtually all projects have environmental effects. The analysis provided by an environmental impact report is to determine whether or not the potential impacts are adverse and significant. The proposed project provides a policy base from which the City can implement programs designed to alleviate problems and achieve goals.

There are a number of environmental issues which, early speculation indicated, might have adverse environmental effects. However, when the analysis is carried out to examine how the Circulation Element contains checks and balances that will ensure project-specific environmental review will occur at the development stage.

For this reason, a number of impacts associated with physical development are found not to be significant:

Land use policy: The proposed project becomes part of the General Plan, and does not result in internal inconsistencies.

8 Effects for which there are no mitigation measures

One identified potentially significant environmental impact is associated with an issue that will require a future assessment when a project-specific EIR is prepared. This is the effect of development on groundwater. An analysis needs to be developed, when a specific project is designed, to determine first where the source of the groundwater is for the Todd Point area; second, what effect the new impervious surfaces will have on the quantity of groundwater; and third, whether the associated development, including a service station and large parking area, will result in any groundwater or surface water contamination. No mitigation measures are feasible within the scope of the Tier II EIR, because the analysis would be highly speculative in nature. With the project EIR currently being developed, it is better that this issue be addressed with a statement of overriding consideration in the Tier II EIR and resolved definitively in the project EIR.

9 Relationship between man's short term use of the environment and long-term environmental benefits

When considering adoption of a policy document, cities and counties must examine the long-term consequences of the proposed action. The CEQA Guidelines state:

§15126(e) The relationship between local short-term uses of man's environment and the maintenance and enhancement of long-term productivity. (The EIR needs to d)escribe the cumulative and longterm effects of the proposed project which adversely affect the state of the environment. Special attention should be given to impacts which narrow the range of beneficial uses of the environment or pose long-term risks to health or safety. In addition, the reasons why the proposed project is believed by the sponsor to be justified now, rather than reserving an option for further alternatives, should be explained.

The findings as included in the Tier I EIR are just as applicable to this tier:

> The City of Fort Bragg is facing a direct problem associated with traffic. Extensive congestion, decreasing driver patience, and other safety factors are being impacted by the increasing coastal population and increases in recreation users. The proposed project provides opportunities to relieve the congestion, smooth the flow of traffic, and increase traffic safety. Implementing the proposed Circulation Element does not result in the wasteful use of any significant environmental resource. The proposed project provides additional opportunities for closer scrutiny of the specific road route proposals

to balance any potential adverse environmental impact with the benefits to the coastal community.

10 Project alternatives

When environmental impact reports are prepared, one aspect of the document is to include a series of alternatives to the project which provide decision-makers with an opportunity to see what other options might exist in lieu of or as a modification to the proposed project.

10.1 No project

The California Environmental Quality Act requires that the discussion of alternatives include an option called the *No project* alternative. This choice is to provide an assessment of what would occur if no action were taken to approve or conditionally approve a project.

In this case, the no project alternative would result in retention of the existing Circulation Element as recently adopted without the specific implementing programs for the Boatyard/Todd Point area. The difference is that the current General Plan does not have an implementing program to carry out the solutions. The no project alternative would result in the continued use of the vague policies XV-6 and XV-7 of the Local Coastal Plan, for which no definitive interpretation has ever been adopted.

If the proposed Traffic Plan is not approved, and the Circulation Element Chapter IIIA remains in effect without any supporting goals, policies, or implementing programs. There would be no direction for the City from which it could develop a program to take advantage of circulation improvement opportunities in this area.

The effect of the no project alternatives are extraordinary. The lack of the Traffic Plan's adoption does not preclude development in the area. It causes developers to rely upon the Local Coastal Policies. These policies permit development if the proponent pays a share of the cost of improvements. The effect is that the City or County would end up collecting fees for future road improvements without being committed to performing the improvements. While it would be possible to require a developer to construct improvements to the area as a mitigation measure to allow a project to develop, the City is prohibited by State law or case law from requiring the developer to construct any more than what would be required as a direct result of the project.

This option results in any improvements being constructed on a piecemeal project-by-project basis rather than a comprehensive basis. Additionally, the proposed project will result in reductions to the land use intensities of virtually all undeveloped parcels. The public record shows that if all parcels develop to the extent permitted by zoning, the traffic volume would be more traffic generated than the area can accommodate. This would mean that those proposing development first would be able to build, and those waiting until later would be prohibited from building.

10.2 Elimination of the Del Mar Drive extension to Highway 20 and consideration of the Harbor Drive Frontage Road

The issue of eliminating Del Mar Drive as a street extension between Ocean View Drive and Highways 1 and 20 has been raised. This issue was addressed superficially in the Draft EIR, and the public comments asked for a different look at the approach.

The objection is that extending Del Mar Drive will bring commercial traffic closer to the residences in the Todd Point area and interfere with the traffic in and out of the college. The reason that the extension of Del Mar drive was proposed was to take southbound and eastbound traffic from residences in Todd Point, the College of the Redwoods, and the proposed K-mart retail complex away from the Ocean View-Highway 1-Boatyard intersection. Traffic projections and the location of the west-side frontage road indicate that the Ocean View intersection is able to handle less traffic moving out of the Plan area than Highway 1 and 20. The belief was that the newly constructed access from Ocean View Drive between the college and K-Mart and into the intersection of Highway 1 and 20 would be attractive to students and areas residents, as well as shoppers. This route would avoid one traffic light and a segment of "highway" traffic. The route would shift a significant number of peak hour critical lane (southbound) trips away from Ocean View and Highway 1.

During the review period, a number of residents of Todd Point indicated that there was a preference that this route not be used. The option proposed was to (A) extend Harbor Drive either directly from Ocean View to Highways 1 and 20 or as (B) a frontage road that turn east from Ocean View, parallel Highway 1, and then connect with the intersection of Highways 1 and 20. Additional options include (C) elimination of the through road while still allowing a + intersection at Highway 1 and 20; and (D) the original "no access" at Highway 1 and 20.

The basis for this option is not intended to avoid or mitigate any environmental issues, but to respond to a preference of area property owners. The original approach was to examine eliminating the + intersection at Highway 1 and 20. Further analysis provides this discussion:

Alternative 2 — Option A: Extend Harbor Drive on its current alignment to the intersection of 1 and 20. This alignment would make it infeasible to develop a structure that would meet the objectives of the current property owner or the proponents of the K-Mart shopping center. Additionally, the access to connect with Highways 1 and 20 would result in road so steep that vehicles would increase noise by need to use lower transmission gears to make the climb and the turn. This option, while it could be constructed, eliminates the major traffic generation in the area. From the standpoint of development potential on Parcel 090, the building intensity would be decreased to the point that the road would not be needed.

Alternative 2 - Option B: Creation of a frontage road. The route of the frontage road that was proposed during the review process was to create a + intersection at Harbor Avenue and Ocean View Drive. This road would then turn to the east between Parcel 080 and 090 until it reached the edge of the drop off to Highway 1. It would then turn south to connect with a + intersection at Highways 1 and 20. Because of the terrain and land area required to

construct the road, this option is not feasible. It would reduce development potential for Parcel 080 to the extent that the parcel could not be developed with its proposed intended use. Second, the road physically cannot connect with Highway 1 and 20 like a frontage road. It would require a sharp turn back to the west and then a 180° turn to drop down to the intersection.

In Option B, the road alignment is so inconvenient it would discourage use of the road by residents in Todd Point or students at the College. One of the purposes of a frontage road is to combine driveways from multiple land uses in order to limit the actual street access for the group to one driveway. This thought process led to Option C.

The major problem is that the radii that are needed for the frontage road would require substantial land area in order to make safe standard turns. This would result in a taking of Parcel 8, and an substantial increase in land area taken from parcels 9 and 11.

Alternative 2 - Option C: No through street — the + is K-Mart's alone. Option C started with the premise that if the main project in the area is K-Mart, then the through road could be eliminated entirely. It would be replaced by a driveway access at Ocean View Drive, using either the Harbor Drive or Del Mar Drive stubbed easements and a driveway that would connect with Highway 1 and 20 from the southwest corner of Parcel 090. The driveway would also serve parcel 110.

This option eliminates through traffic using Del Mar, but it does require that the College and Todd Point residences use the Ocean View access. Additional calculations would be needed, but it appears that the traffic shift would balance between the two intersections. The assumption is that the K-Mart project would be designed in such a manner that the Highway 1 and 20 intersection will be the main entrance and the Ocean View would be a back entrance.

A drawback to this approach is that if the College were to expand, the Ocean View intersection will not be able to accommodate the growth of the college. However, the college could construct a "south" parking lot that would access from the K-Mart Highway 1 and 20 driveway. This parking lot could connect internally with the existing college parking lot. Option C is not infeasible, but would not mitigate or avoid any impacts that the proposed Del Mar Extension would generate. Option C provides another reasonable alternative for the Council.

Alternative 2 - Option D: No + intersection at Highway 1 and 20. This option is infeasible because it will overload the intersection of Ocean View and Highway 1, resulting in LOS E during peak hour. It would not conform to the overall goal of the Traffic Plan.

10.3 Change the traffic allocation from fair share to first-come first used

This alternative provides the simplest method for implementing the Traffic Plan. Instead of allocating traffic to each parcel, the total available peak hour volume would remain available to the first users. This would simplify the City's implementation, but leave some developers without traffic capacity to support projects allowed by zoning. Utilization of this methods would result in an increase in the number of speculative projects design to hoard traffic capacity rather than serve the community.

11 Statements of overriding consideration

If the City adopts the Traffic Plan as it is proposed, there are two potentially significant effects for which there are no mitigation measures that can be implemented by the City as a part of this Plan and EIR. In the case where a lead agency is approving a project that has unmitigated significant environmental effects, the agency must approve *Statements of Overriding Consideration.* This chapter of the EIR proposes the language for the statement needed for this project.

1. The project may result in significant effects on groundwater

The proposed project may result in the development of a major shopping complex west of Highway 1 along an extension of Del Mar Drive. This project, for which final plans have not been prepared, may result in the overcovering of as much as 700,000 square feet of presently undeveloped wild land with impervious surface. It is believed by property owners of residences in the Todd Point area, who obtain their water from onsite domestic wells, that this could have a substantial effect on the quantity and quality of their groundwater. It is not feasible to provide an assessment of the groundwater impact in the Tier II EIR. However, as this document is being prepared, a project-specific EIR for the development of the property is in the process of initial preparation. Since conditions cannot be imposed on a policy document adopted as a legislative act, it is more appropriate for the matter to be addressed in the project EIR. The City Council adopts this Traffic Plan as a part of the Circulation Element, because the implementation of this document provides general benefits by maintaining Level of Service D in the planning area.

2. The project may result in significant unmitigated sources of light and glare

The proposed Traffic Plan may result in the development a major shopping complex west of Highway 1 along an extension of Del Mar Drive. This project, for which final plans have not been prepared, may result in the addition of new light and glare visible to the residents of Todd Point. It is not feasible to define how and where lighting will be located for the proposed shopping complex as final designs have not been submitted. However, as this document is being

prepared, a project-specific EIR for the development of the property is in the process of initial preparation. Since conditions cannot be imposed on a policy document adopted as a legislative act, it is more appropriate for the matter to be addressed in the project EIR. The City Council adopts this Traffic Plan as a part of the Circulation Element, because the implementation of this document provides general benefits by maintaining Level of Service D in the planning area.

Light and glare may also be generated by headlights from vehicles traveling west from Highway 20 into the commercial complex at Parcels 9 and 11. The headlights, especially on Ocean View Drive, could shine directly onto private residential property. Until the City, County, and State of California agree on a final design for the street network, it is not feasible to impose precise mitigation measures on the design to attractively mitigate or avoid glare from mobile vehicles. The City Council finds that the need to adopt the Plan in order to move forward with final project design outweighs the ability to precisely define a mitigation program to avoid or reduce to insignificance the effects from vehicle lights. The Plan does incorporate standards that will result in mitigation being developed for light and glare at the time development is proposed. While these measures are foreseeable, it is not feasible to tie mitigation to a policy document.

3. The project may result in significant impacts concerning noise

The proposed Traffic Plan may result in the construction of a new road segment west of Highway 1 that is intended to serve commercial development. This new road extension and changes in traffic patterns may result in increases in mobile-source generated noise exposure to the residents in Todd Point. Until the final design is prepared and mitigation measures are tied precisely to the design and development proposals, it is not possible to determine whether or not the effects can be avoided or reduced to levels of insignificance. The precise design of the road network and the methods of mitigation cannot be defined at this time. It is known that there are numerous accepted acoustical engineering practices that may effectively result in noise not being significant. However, until that time, the Council finds that the need to move forward with a comprehensive policy plan is critical. This policy document will allow final design and mitigation programs to be defined on a comprehensive and area-wide basis. Noise mitigation will be incorporated into the design phase.

12 Environmental compliance and mitigation monitoring program

12.1 Summary of mitigation measures

Upon certification of the EIR and approval of the Circulation Element, the City will need to adopt a program to ensure that the selected mitigation measures in the Environmental Impact Report are carried out. This chapter identifies the mitigation measures and how the enforcement program will be carried out.

(a) *Mitigation measure 4.2.2(a):* When a specific project route is selected and the environmental process begins, the Tiered Environmental Impact Report shall incorporate a study on the changes in soil absorption patterns due to the compaction and overcovering of the area.

(b) *Mitigation measure 4.4.2(a):* Update the noise element to determine the location of traffic noise contours compared to 1980 and determine whether the projected 1995 contours are still accurate. Additionally, provide noise models in the update for changes in circulation patterns projected in the Circulation Element.

(c) *Mitigation measure 4.7.2(a):* As the budgets are developed for constructing the proposed road extensions, the City shall provide an estimate of annual maintenance costs to the Mendocino Council of Governments in order to ensure that the County of Mendocino Department of Public Works receives adequate funds for ongoing road maintenance.

12.2 Enforcement of mitigation measures

Mitigation measure 4.2.2(a) can be classified as a mitigation measure that will require that specific topics be assessed in detail when the project-specific tiers of the environmental impact report process are initiated. These can be implemented by adding implementation measures to the Traffic Plan to require that the detailed environmental analysis be a part of the implementation of the Circulation Element and the Plan following its adoption into the Element.

Mitigation measure 4.4.2(a) directs the Council to update portions of the General Plan. In order to carry out this mitigation measure, the Council needs to provide in its short- or intermediate-term financial planning funding to update the General Plan. This may be accomplished by direction to the City Administrator.

Mitigation measure 4.7.2(a) requires a dialogue with the Mendocino Council of Governments, CalTrans, and the County. An implementation measure should be added to the Circulation Element to ensure assessment of the long-range fiscal impact.